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Office of Audits and Evaluations

VETERANS BENEFITS ADMINISTRATION

Processing of Post-9/11
GI Bill School Vacation
Breaks Affects Beneficiary
Payments and Entitlement

AUDIT

REPORT #21-02437-120

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Executive Summary

As part of the Post-9/11 Veterans Educational Assistance Act of 2008 (Post-9/11 GI Bill), veterans, their spouses, and their children receive benefits to help pay for school or job training, including tuition, a monthly housing allowance, and college fund payments.¹ The Veterans Benefits Administration (VBA) administers these benefits through its regional processing offices, which receive enrollments, adjust claims, and pay students' bills. In fiscal year 2020, VBA paid 657,927 students about \$10.1 billion in education benefits under the Post-9/11 GI Bill. These benefits serve a vital function in helping veterans regain the educational opportunities they may have missed while serving in the military.

Post-9/11 GI Bill benefits may be used to fund education occurring in both standard semesters and nonstandard terms—those that are shorter or longer than a standard quarter or semester. For nonstandard terms, VBA claims examiners must deduct student vacation breaks from Post-9/11 GI Bill benefits if the breaks total seven days or more.² These vacation breaks vary by school and by program. Students should not be counted as being in the classroom for the time they spend on vacation.

As part of determining these benefits, VBA claims examiners calculate a student's "rate of pursuit," which is similar to course load and, for nonstandard terms, is directly affected by the number of weeks the student is in attendance.³ This rate is then used to determine the amount of Post-9/11 GI Bill benefits charged from their total entitlement and percentage of housing allowance payments received. When claims examiners do not deduct vacation breaks during nonstandard terms, the rate of pursuit is reduced, essentially treating students as if they have a lower course load than they actually have. A lower rate of pursuit may lead to undercharges to the student's overall entitlement and underpaying their housing allowances.

Though necessary, adjusting for vacation breaks for nonstandard terms complicates VBA's work because these benefits require manual processing. Accordingly, the VA Office of Inspector

¹ See VBA technical comment 2, "Executive Summary Page i, footnote 1," on page 33. College fund payments, also known as GI Bill kicker payments, must be used in conjunction with the GI Bill. These payments are added to the veteran's monthly housing allowance. According to VBA's education training portal, the college fund payment can be worth up to \$350 per month, depending on length of enlistment contract, service joined, chosen job, and place of service. (This does not include the Buy Up option that is separate from the college fund (see page 20).)

² 38 C.F.R. chapter I, part 21, subpart D, § 21.4272.

³ To determine the rate of pursuit in nonstandard terms, VBA first calculates the student's number of credit hour equivalents by multiplying the number of credits the student is pursuing by 12 for quarter hours and 18 for semester hours, and then dividing the result by the number of weeks the student is in attendance. The rate of pursuit is then determined by dividing the number of credit hour equivalents by the number of credit hours the school considers to be full-time.

General (OIG) conducted this audit to determine whether VBA is correctly processing Post-9/11 GI Bill student enrollments that include official school vacation breaks.

What the Audit Found

The OIG found that VBA did not always accurately process enrollments that included official school vacation breaks. From August 1, 2020, through April 1, 2021 (the review period), there were approximately 10,000 Post-9/11 GI Bill student enrollments for nonstandard terms. Based on OIG's sampling, an estimated 2,500 enrollments during this period should have been adjusted for vacation breaks but were not. The OIG also estimated that of those 2,500 enrollments, approximately 790 (31 percent) of the estimated errors involved school certifying officials (individuals employed by institutions of higher learning to certify VA student enrollment to VBA) either not reporting or underreporting vacation break periods.⁴

VBA relies on school certifying officials to correctly report students' vacation breaks, yet neither the training provided to the officials nor the language in the handbook was sufficient to ensure they understood this responsibility. Some school certifying officials were unable to locate instructions in the guidance; others were unable to properly state the requirement to include all consecutive days of the vacation period, including any weekends.⁵ Thus, they frequently made mistakes when reporting this information. Because VBA staff receiving the erroneous information did not verify it, they did not catch the mistakes. Consequently, school certifying officials were not provided feedback that mistakes were made. Ultimately, VBA cannot accurately adjust the veterans' education benefits if school certifying officials do not report this information correctly.

Even when school certifying officials submitted the right information, VBA claims examiners often mishandled the enrollments. The OIG estimated that of the 2,500 enrollments with vacation break errors, VBA claims examiners incorrectly processed vacation breaks that were accurately reported by the school certifying officials for about 1,700 enrollments (69 percent). Often, they overlooked the vacation break information that certifying officials included in the remarks section of the enrollment form and did not deduct required breaks from students' term enrollment period.

Most of these errors would not have occurred if VBA did not need to rely on a manual system to report and process students' vacation breaks, which offers many opportunities for errors. VBA officials indicated that modernization efforts, specifically the Digital GI Bill, will improve the automated processing of education enrollments, including those that contain vacation break

⁴ Estimates and percentages appearing in the report are rounded; therefore, they might not sum correctly. For full scope, methodology, and statistical sampling information, see appendixes A and B.

⁵ VA School Certifying Official Handbook (Online), "Non-Standard Terms – Rate of Pursuit (Chapter 33 Undergraduate or NCD Measured in Credit Hours)," March 5, 2021, requires that inclusive dates of more than seven consecutive days be calculated as reportable break days. This would necessitate counting weekends as break days.

periods.⁶ The portion of the Digital GI Bill that could enhance the processing and reporting of vacation breaks is expected to be completed by September 2022. If the new digitized enrollment process can be designed to capture vacation break information automatically, enrollments may not need to be manually reviewed and processed by claims examiners. However, even with automating the enrollment certification process, VBA still needs to ensure school certifying officials are entering accurate information into the digitized system.

The OIG also maintains that VBA's local quality review process should examine the processing of enrollments related to vacation breaks, primarily through data analysis techniques to identify these types of enrollments for further scrutiny. Because enrollments that need to be adjusted for vacation breaks are a relatively small subset of the overall student enrollments for the Post-9/11 GI Bill program—just 10,000 of about 1.4 million enrollments—claims examiners' vacation break-related adjustments are rarely included in these quality reviews. Using data analysis and record matching to identify enrollments likely to have some form of vacation break that has gone unreported or unprocessed and are therefore more prone to containing errors would provide a focused sample for separately assessing their quality. The results could be used to help claims examiners improve their work and help VBA prevent these types of errors.

As long as VBA relies on its manual process for adjusting vacation breaks, it must take steps to ensure these adjustments are accurate. The OIG determined that the estimated 2,500 enrollments with vacation break errors resulted in about 14,400 days of undercharges to students' entitlement and approximately \$624,000 was underpaid to beneficiaries for monthly housing allowance and college fund payments.⁷

What the OIG Recommended

The OIG recommended VBA update the School Certifying Official Handbook and consider other training aids to ensure they clearly detail how to calculate and report vacation breaks. Other recommendations to VBA include developing and implementing procedures for claims examiners to verify that all consecutive days are reported for vacation breaks in the remarks section in enrollments flagged for manual processing. For reporting errors identified during this review, amended enrollments from school certifying officials should be submitted to VBA for remedial action. As part of its quality review process, data analysis and record matching can be used to identify enrollments likely to have vacation breaks that have not been properly reported or processed that warrant additional attention. Finally, as VBA continues to develop a new

⁶ According to a VBA Education Service training presentation, Digital GI Bill® is a modernized digital platform that will provide direct, online, one-stop access to GI Bill benefits for beneficiaries and external partners such as institutions of higher learning.

⁷ Appendix C presents the underpayments estimate as a questioned cost.

automated system for processing enrollments, it should include fields for vacation breaks to minimize errors caused by manual data entry.

VA Management Comments

The acting under secretary for benefits concurred with all recommendations and provided acceptable action plans on implementation. VBA also provided 19 technical comments for this report. The full text of the acting under secretary for benefits' comments, the action plan, and the technical comments appear in appendix D.

OIG Response

The acting under secretary's planned corrective actions are responsive to recommendations and address the issues identified in the report. The OIG will monitor VBA's progress and follow up on the implementation of the recommendations until all proposed actions are completed.

In response to the acting secretary for benefits' 19 general and technical comments, the OIG made language changes as appropriate when additional support was provided. For other comments, the OIG disagreed with the accuracy of the proposed changes. The OIG's responses to the technical comments are on pages 19 through 21.



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Introduction

The Veterans Benefits Administration (VBA) provides benefits from the Post-9/11 Veterans Educational Assistance Act of 2008 (Post-9/11 GI Bill) to help veterans, their spouses, and their children pay for school or job training.⁸ In fiscal year (FY) 2020, VBA paid 657,927 students about \$10.1 billion in education benefits as part of the Post-9/11 GI Bill. These benefits serve a vital function in helping veterans regain the educational opportunities they may have missed while serving in the military.

Students enrolled in a Post-9/11 GI Bill program may be eligible to receive up to 36 months of full-time education benefits, which can include tuition, a monthly housing allowance, and college fund payments.⁹ The 36 months are equivalent to 1,080 days, and benefits received (also known as entitlement) are converted to or calculated in days and subtracted from (charged against) that total.¹⁰ For example, students attending an institution of higher learning are charged one day of entitlement for each day of learning. 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.

In selecting their degree programs, students can enroll in either standard quarter or semester terms or nonstandard terms that are shorter or longer than a standard quarter or semester. To ensure benefit calculations are based on the number of credits a student is taking in comparison with the credits required to be full-time, VA converts nonstandard enrollment credits into equivalent credit hours. For nonstandard terms, vacation breaks of seven or more consecutive days must be reported and deducted from students' enrollment periods to ensure the equivalent credit hours reflect the weeks a student receives instruction.¹¹

For each student, VBA calculates a "rate of pursuit" (similar to course load), which is a multiplier expressed as a percentage, representing the credits a student is taking in comparison with the credits required for full-time enrollment. If vacation breaks are not deducted, the student

⁸ 38 U.S.C. § 3313(A)9i and 38 U.S.C. § 3313(B)(i) –(III) (bb), et seq. The Post-9/11 GI Bill assists with student expenses, such as tuition and fees, books, supplies, and, for some qualified students, a monthly housing allowance.

⁹ See VBA technical comment 3, "Page 1, paragraph 2," on page 33. Report language was revised to clarify that the OIG was describing 36 months of full-time education benefits and not full-time students, since students with a rate of pursuit less than 100 percent and greater than 50 percent are eligible for housing allowance payments. See VBA technical comment 4, "Page 1, footnote 8," on page 33-34. College fund payments, also known as GI Bill kicker payments, must be used in conjunction with the GI Bill. These payments are added to the veteran's monthly housing allowance. According to VBA's education training portal, the college fund payment can be worth up to \$350 per month, depending on length of enlistment contract, service joined, chosen job, and place of service. (This does not include the Buy Up option that is separate from the college fund (see page 20).)

¹⁰ Depending on the student's specific school program and rate of pursuit (explained in text), the total amount of these benefits used varies by case.

¹¹ 38 C.F.R. chapter I, part 21, subpart D, § 21.4272.

would appear to be taking longer to complete the same number of credits—the student’s equivalent credit hours would then be diminished by the weeks of break. If the credit hour equivalents reflect a diminished number of credit hours, the rate of pursuit will also be diminished. In turn, if the rate of pursuit is lower than it should be, the student’s entitlement will be undercharged and the student’s housing allowance will be underpaid.¹²

The VA Office of Inspector General (OIG) conducted this audit to determine whether VBA is correctly processing Post-9/11 GI Bill student enrollments that include official school vacation breaks.

School Certifying Officials

Institutions of higher learning employ certifying officials who are responsible for certifying VA student enrollment to VBA. They complete the required VA forms electronically using the VA-ONCE system.¹³ School certifying officials submit students’ information, including program of study, dates of the school term, any vacation break periods in the term, and any changes that occur during the term (such as an increase or decrease in the number of credit hours taken). VBA depends on school certifying officials to accurately report vacation periods so that claims examiners can adjust enrollment records to account for only the number of days of learning in a school term.

Regional Processing Offices

Regional processing offices are VA offices where all claims for educational assistance—such as the Post-9/11 GI Bill, Active Duty Montgomery GI Bill, and Selected Reserve Montgomery GI Bill—are processed and decided. The regional processing offices’ mission is to provide veterans, service members, reservists, and certain family members of veterans with the educational resources to supplement missed opportunities due to military service. The VA has two education regional processing offices serving all 50 states and US territories: these offices are located within the VA regional offices in Buffalo, New York, and Muskogee, Oklahoma. Both the Buffalo and Muskogee processing offices have over 500 employees each, and each office is responsible for handling education benefit claims for its half of the country.

The director of the regional office also oversees the processing office staff, composed of

- an education officer responsible for administering the full range of education benefits and services provided to veterans, spouses, and children;

¹² College fund payments, also known as GI Bill kicker payments, are paid to qualifying veterans regardless of rate of pursuit or eligibility for monthly housing allowance. The applicable full-time bonus rate is multiplied by the rate of pursuit (rounded to the nearest multiple of 10) to determine bonus payment amount.

¹³ Online Certification of Enrollment (VA-ONCE) is VA’s web-based system for certifying the enrollment and changes in enrollment of students.

- supervisory veterans claims examiners, who provide counsel and instruction to individual employees within a team;
- education quality training specialists, who serve as technical advisers to veterans claims examiners; and
- claims examiners, who process education benefit claims. Claims examiners determine eligibility for entitlement and the amount of payment due to an eligible veteran, spouse, or child, and authorize such benefits.

Calculation of Post-9/11 GI Bill Housing Allowances and Entitlement

To determine eligibility for monthly housing allowance payments, VBA must first calculate a student's rate of pursuit (similar to course load) for a degree or certificate. The rate of pursuit is calculated using credit hours for standard terms and credit hour equivalents for nonstandard terms.¹⁴ When a student is enrolled in a nonstandard term, VBA converts the credit hours certified by the school into credit hour equivalents. Credit hour equivalents are calculated by taking the credit hours in the term and multiplying by 12 for quarter hours and multiplying by 18 for semester hours and then dividing by the number of weeks the student will be in attendance, after deducting vacation break periods from the enrollment, when applicable.¹⁵ If students are reported to have spent more weeks in class than they actually attend, their number of equivalent credit hours may be reduced. VBA then calculates the rate of pursuit by dividing the number of credits or credit hour equivalents being pursued by the number of credit hours considered to be full-time by the school.¹⁶ The resulting percentage is the student's rate of pursuit.

The Post-9/11 GI Bill monthly housing allowance is paid if the rate of pursuit is 50 percent or more.¹⁷ Monthly housing allowance payments are based on the student's rate of pursuit, rounded up or down to the nearest 10 percent and the student's benefit level.¹⁸ For example, a student with a rate of pursuit of 67 percent would be paid at 70 percent of the total monthly housing allowance for the student's area of residence. That rate is multiplied by days of instruction or training.

For Post-9/11 GI Bill students attending institutions of higher learning, VBA bases entitlement charges on the number of days of school and whether students attend full-time or part-time. For

¹⁴ VA School Certifying Official Handbook (Online), "Rate of Pursuit and the Monthly Housing Allowance," March 5, 2021.

¹⁵ 38 C.F.R. chapter I, part 21, subpart D, § 21.

¹⁶ VA School Certifying Official Handbook (Online), "Rate of Pursuit and Training Time," March 5, 2021.

¹⁷ VA School Certifying Official Handbook (Online), "Rate of Pursuit and Training Time," March 5, 2021.

¹⁸ See VBA technical comment 5, "Page 3, paragraph 2," on page 34. A student's benefit level (expressed as a percentage between 50 and 100) is determined by length of service. Housing allowance payments are prorated if the student's benefit level is less than 100 percent.

example, if a full-time student attends school for 12 months, the student uses 12 months (or 360 days) of entitlement.¹⁹ The amount of entitlement charged is determined by multiplying the student’s rate of pursuit by the total number of days in the enrollment term without deducting vacation breaks.²⁰

When claims examiners do not account for vacation breaks by deducting them from the nonstandard enrollment term, the rate of pursuit is reduced, essentially treating students as if they have a lower course load than they actually have.²¹ A lower rate of pursuit decreases the number of days charged against the students’ entitlement and the students’ monthly housing allowance payment. This may lead to undercharged entitlement and underpaid housing allowance.

Table 1 provides examples of how the rate of pursuit is calculated and used when determining the amount of entitlement charged against the student’s benefit and the monthly housing allowance payments. It also shows how vacation break periods affect calculations for nonstandard term students.

Table 1. Rate of Pursuit and Entitlement Calculation Examples

Calculation	Student 1 standard term (16 weeks - semester hours)	Student 2 standard term (16 weeks - semester hours)	Student 3 nonstandard term (eight weeks - quarter hours)	Student 4 nonstandard term (eight weeks with two-week vacation break - quarter hours)
1. Determine the number of days in the certified term . Remove vacation break, where applicable, and multiply the number of weeks by seven	112	112	56	42
2. Record the student’s number of credit hours per term*	8	4	6	6

¹⁹ See VBA technical comments 6, “Page 3, paragraph 3,” and 7, “Page 3, paragraph 3, last sentence,” on page 34. According to the VA School Certifying Official Handbook (Online), “Benefit Payments,” March 5, 2021, VBA counts each month as having 30 days (12 x 30 = 360) regardless of actual calendar days. The audit team used 30-day months or 360 days in calculating benefits. The report was corrected to revise a typographical error.

²⁰ VA School Certifying Official Handbook (Online), “Entitlement Charges,” March 05, 2021.

²¹ See VBA technical comment 8, “Page 4, paragraph 1, first sentence,” on page 34. Since the consideration of vacation breaks in the rate of pursuit calculation is for students in nonstandard terms, OIG inserted “nonstandard” to clarify the type of enrollment.

Calculation	Student 1 standard term (16 weeks - semester hours)	Student 2 standard term (16 weeks - semester hours)	Student 3 nonstandard term (eight weeks - quarter hours)	Student 4 nonstandard term (eight weeks with two-week vacation break - quarter hours)
3. Determine equivalent credit hours for nonstandard terms. Remove vacation breaks, where applicable, and multiply credit hours by 12 (for quarter hours) or 18 (for semester hours) and divide by number of weeks	Not applicable	Not applicable	9	12
4. Determine the rate of pursuit . Divide the credit hours or equivalent credit hours by 12	0.67	0.33	0.75	1.0
5. Determine percentage of monthly housing allowance payment by rounding rate of pursuit to the nearest 10%	70%	Not eligible for monthly housing allowance since rate of pursuit < 50%	80%	100%
6. Determine the number of (whole) days of entitlement charged by multiplying the number of days by the rate of pursuit [†]	75	37	42	56 [§]

Source: VA OIG analysis.

* See VBA technical comments 9, “Page 4, Table 1,” and 11, “Page 4, Table 1,” on pages 35-36. The OIG removed “quarter hours” from row 2 of the table and modified the header to reflect that students 1 and 2 have standard semesters, while students 3 and 4 have nonstandard quarter-hour terms.

[†]See VBA technical comment 12, “Page 4, Table 1, Row 5,” on page 36. A monthly housing allowance is paid if the rate of pursuit is 50 percent or higher. The OIG revised the table to indicate that a student with a rate of pursuit less than 50 percent would not be eligible for a monthly housing allowance.

‡ See VBA technical comment 13, “Page 5, Table 1, Row 6,” on page 36. According to VA School Certifying Official Handbook (Online), “Benefit Payments” March 5, 2021, VBA counts each month as having 30 days regardless of the actual number of calendar days, resulting in 360 days of entitlement in a calendar year ($12 \times 30 = 360$).

§ The entitlement charged is determined by the actual number of days in the term and does not deduct vacation breaks. In this case, all eight weeks (56 days) would be included in the days of entitlement calculation.

Processing of Student Enrollments

School certifying officials provide student enrollment information electronically to VBA using the VA-ONCE system. For enrollments that can be processed using automation, the enrollment information moves from the VA-ONCE system into VBA’s Long Term Solution application. However, according to VBA’s deputy director of operations, due to current limitations in the number of available data fields the Long Term Solution application can receive from VA-ONCE, vacation break periods must be entered into the remarks section of the enrollment in VA-ONCE. The Long Term Solution application redirects any enrollment with nonstandard remarks from automated to manual processing.²² Therefore, VBA’s claims examiners must manually process student enrollments by reviewing the remarks section and entering the number of vacation break days into the Long Term Solution application. The application then calculates the student’s rate of pursuit and education benefits. Figure 1 illustrates the Post-9/11 GI Bill enrollment process.²³

²² See VBA technical comment 14, “Page 5, paragraph 1, fifth sentence,” on page 37. During the audit, VBA indicated to the OIG that enrollments with remarks were redirected for manual processing. However, there was no mention or documentation of standard remarks being automated. OIG concedes that not all enrollments with remarks are redirected for manual processing and clarified by adding “nonstandard” to describe the remarks that are redirected for manual processing.

²³ See VBA technical comment 15, “Page 6, Figure 1, Enrollment process flowchart,” on page 37. During the audit, VBA indicated to the OIG that enrollments with remarks were redirected for manual processing. However, there was no mention or documentation of standard remarks being automated. OIG concedes other factors may require an enrollment to be processed manually and added the term “nonstandard” to describe the enrollment remarks related to vacation breaks requiring manual processing.

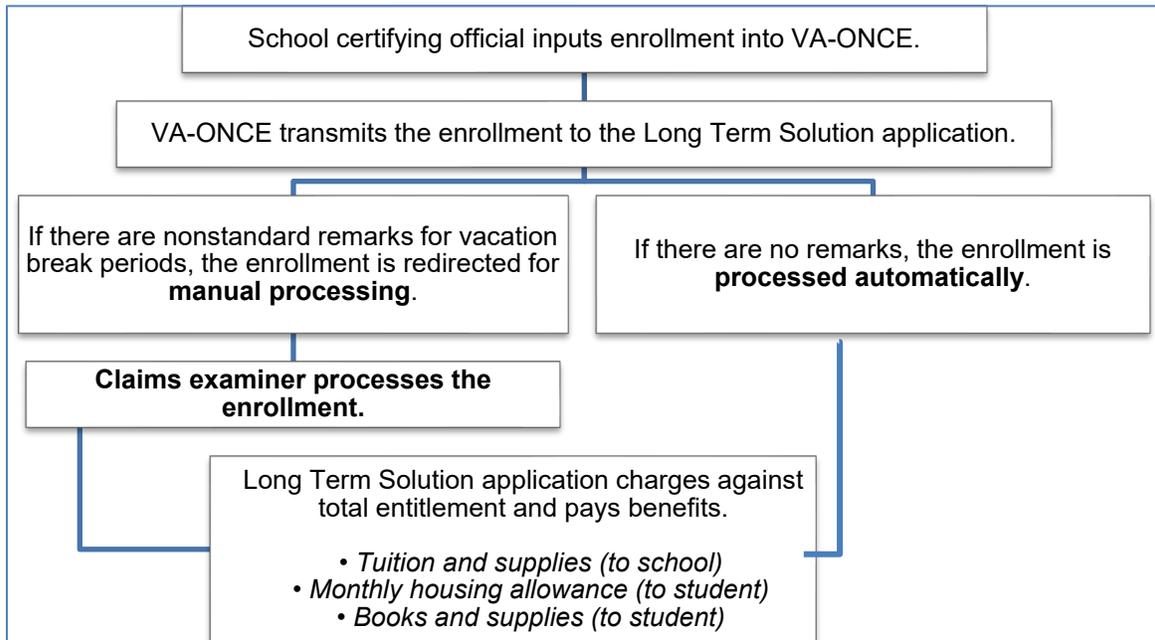


Figure 1. Enrollment process flowchart.

Source: VA OIG analysis.

Results and Recommendations

Finding: VBA Did Not Accurately Process Student Enrollments Containing Vacation Breaks

Based on a review of a sample of 185 Post-9/11 GI Bill student enrollments submitted from August 1, 2020, through April 1, 2021, the OIG found that VBA did not accurately process enrollments that include official school vacation breaks. The OIG estimated that 2,500 enrollments had vacation break processing or reporting errors for the same period. For approximately 790 of these 2,500 enrollments (31 percent), the OIG found that school certifying officials either did not report or underreported vacation break periods. For about 1,700 enrollments (69 percent), VBA claims examiners incorrectly processed vacation breaks reported by the school certifying officials.²⁴

Overall, these errors occurred because VBA adjusts students' education benefits using a manual process that is prone to errors. Also, VBA guidance for school certifying officials does not clearly define how to calculate and annotate vacation breaks on student enrollments. Some school certifying officials the audit team interviewed were unable to locate instructions in the guidance; others were unable to correctly state the requirement to include all consecutive days of the vacation period, including any weekends.²⁵ Similarly, VBA's claims examiners did not comprehensively review education enrollments to identify and process school vacation breaks, and often did not adjust enrollments properly to omit these breaks.

As a result, the OIG estimated that errors on these 2,500 enrollments created about 14,400 days of undercharged entitlement, as well as \$624,000 in underpaid monthly housing allowance and college fund payments. Because their rate of pursuit is being understated, the students are receiving less housing support than they are entitled to and not enough days are being deducted from their benefit entitlement. These errors could significantly affect the students' educational opportunities unless VBA takes steps to correct them.

The OIG's finding is supported by the following determinations:

- School certifying officials did not consistently calculate and report vacation breaks.
- Claims examiners were not required to verify the information submitted by school certifying officials.

²⁴ Estimates and percentages appearing in the report are rounded; therefore, they might not sum correctly. For full scope, methodology, and statistical sampling information, see appendixes A and B.

²⁵ VA's School Certifying Official Handbook (Online), "Non-Standard Terms – Rate of Pursuit (Chapter 33 Undergraduate or NCD Measured in Credit Hours)," March 5, 2021, says inclusive dates of more than seven days would necessitate that weekends be included in the report and calculated as break days.

- Claims examiners did not properly adjust enrollments with vacation breaks.
- VBA could improve its quality review process by using data analysis and record matching to identify enrollments likely to have vacation breaks that were not properly reported or processed.
- VBA should continue to work on automating the adjustment of education benefits and include fields for vacation breaks to decrease the opportunity for errors.

What the OIG Did

From the total of about 1.4 million Post-9/11 GI Bill enrollments received between August 1, 2020, and April 1, 2021, the audit team identified approximately 10,000 nonstandard enrollments that could require vacation breaks to be reported during the review period. The team conducted further data analysis to focus the audit population and identify enrollments for which vacation break periods potentially should have been reported but were not, indicating a potential processing or reporting error. This process reduced the population to about 2,800 Post-9/11 GI Bill student enrollments that contained potential vacation break errors.²⁶ From these 2,800 enrollments, the team then selected a random sample of 185 and examined them to determine whether vacation breaks were properly reported, entitlement was correctly calculated, and monthly housing allowance and college fund payments were calculated and paid accurately. After examining the sample enrollments, the team estimated that about 2,700 of 2,800 enrollments were within the scope of the audit.²⁷

The OIG used its statistical sample to estimate that about 2,500 of those 2,700 enrollments (94 percent) for the review period have vacation break processing or reporting errors. The team also conducted virtual site visits to interview regional processing office staff and school certifying officials. Appendixes A and B provide further information about the audit methodology and statistical sampling methodology.

As discussed in the sections that follow, the team's additional interviews and observations helped reveal that errors occurred either because school certifying officials did not consistently calculate and report vacation breaks or because VBA claims examiners did not properly adjust enrollments with vacation breaks.

²⁶ The academic year is from August 1, 2020, to April 1, 2021.

²⁷ On closer review, the team found that some enrollments with the word *break* in the remarks section did not refer to vacation breaks. The team therefore eliminated those enrollments from the population based on the team's set criteria and chose replacement sample enrollments, keeping the sample total of 185.

School Certifying Officials Did Not Consistently Calculate and Report Vacation Breaks

For approximately 790 of 2,500 estimated enrollments with errors (31 percent), the OIG found that school certifying officials either did not report at all or underreported vacation break periods (such as not including weekends when required). For students' education benefits to be accurately adjusted, VBA relies on school certifying officials to accurately report vacation break periods, but the certifying officials' training, which occurred during their initial certification, and their handbook did not include clear guidance on how to report vacation breaks. As a result, for these 790 enrollments, VBA undercharged the students in total about 4,300 days of entitled education and underpaid them an estimated \$178,000 in monthly housing allowance and college fund payments.

Example 1 illustrates how a school certifying official's failure to report the required vacation breaks with the enrollment submitted to VBA affected a veteran student.

Example 1

A student enrolled in an automotive technology class at Western Technical College, where full-time enrollment is 12 hours. The class consisted of six semester hours over 11 weeks of study from November 19, 2020, to February 3, 2021, which included 19 days of vacation break. However, the school certifying official did not report the 19 days of vacation break when submitting the student's enrollment to VBA. Therefore, the student's rate of pursuit was incorrectly calculated at 80 percent (instead of 100 percent). As a result, the student was undercharged a total of 15 days of entitlement and underpaid \$646.50 in total monthly housing allowance.

Based on its review of 185 enrollments, the team found 29 enrollments for which the school certifying official did not report any vacation breaks, resulting in students not receiving the proper value of their education benefits, like the student in example 1.

School Certifying Officials Were Not Properly Trained to Accurately Report Vacation Breaks

VBA's process for adjusting students' education benefits relies on school certifying officials to accurately report vacation breaks. However, VBA only trained the certifying officials on this topic as they prepared for certification. The certifying officials interviewed by the audit team had received that training an average of seven years earlier.

The initial training VBA provides to school certifying officials is a web-based instructional program containing modules related to the certifying officials' role, responsibilities, and reporting requirements to VA. School certifying officials must successfully complete all modules

to obtain certification. The training instructs certifying officials to enter the number of break days for breaks that are seven days or more and include the date range as a remark on the enrollment certification form. However, the training does not specifically instruct the certifying officials to report consecutive days, including weekends, and is not consistent with the handbook. School certifying officials might complete this training without a clear understanding of how to determine the number of break days that occur on their school's calendar. As discussed below, they should be including adjacent weekends in their vacation break reports.

School Certifying Official Handbook Does Not Have Clear Guidance on Reporting Vacation Breaks

Once school certifying officials have been trained and are certified to process enrollments, VBA instructs them to consult their handbook if they have questions on how they should accurately report vacation breaks. However, the OIG found that the handbook did not have clear directions for how to report vacation breaks.²⁸ The guidance for reporting vacation breaks appears as a note in the section discussing rate of pursuit calculations for nonstandard terms. The handbook note does not

- specify whether officials should be reporting the number of days or a date range of breaks in the remarks, or
- clearly explain that all consecutive days of official school vacation breaks, including weekends, should be included in the calculation.

By excluding two weekend days from the total vacation break, school certifying officials could affect the entitlement charged against the student's total benefit and the amount of housing allowance a student will receive. Figure 2 is an excerpt from the handbook note related to vacation breaks, and as indicated above, does not specify how to report the breaks or when weekends should be included.

²⁸ VA School Certifying Official Handbook (Online), "Preface." The online handbook is written for VA certifying officials and anyone at a school involved with certification of VA education benefits.

Non-Standard Terms - Rate of Pursuit (Chapter 33 Undergraduate or NCD Measured in Credit Hours)

Always certify the actual credit hours applicable toward the student's program for all enrollment periods. If you certify a non-standard length term, VA will convert the credit you certify to credit equivalents. Below is how VA will determine term length and rate of pursuit.

- VA will begin by calculating the number of weeks in the period certified. VA will count the number of days in the enrollment period (first day through the last day) and divide by 7. VA will disregard a remainder of 3 days or less or count a remainder of 4 days or more as an additional full week.
- In a standard quarter or semester for chapter 33 students the rate of pursuit is determined by dividing the credit hours pursued by the full-time equivalent (normally 12). For instance, 7 credit hours divided by 12 would be 58%. chapter 33 students' rate of pursuit must be more than 50% to receive the Monthly Housing Allowance.
- For non-standard terms, the equivalent credit hours will be determined prior to computing rate of pursuit. For instance, 4 credit hours in a 6-week semester is the equivalent of 12 credit hours. VA will then divide the 12 credit hours by 12, for a rate of pursuit of 100%. However, 4 credit hours in a 6-week quarter is the equivalent of 8 credit hours. VA will divide the 8 credit hours by 12, for a rate of pursuit of 67%. For determining the monthly housing allowance, the rate of pursuit will be rounded to the nearest 10%. MHA could be paid at 70% for the student enrolled in quarters.

(See the formulas VA uses to calculate equivalent credit hours under the section titled [Equivalent Credit Hours \(Non-33 Undergraduate\)](#)).

NOTE: Always report the inclusive dates of official school vacation periods which are 7 or more consecutive days when certifying non-standard enrollment periods for all benefits in the remarks. Do not report vacation periods on standard length terms.

Figure 2. Vacation break reporting requirements.

Source: VA's School Certifying Official Handbook.

The team interviewed 10 school certifying officials, eight of whom were from schools that offered nonstandard terms. Interviews with these school certifying officials reflected that the instructions on how to report vacation breaks are difficult to locate in the handbook and are also vague, leading to varied interpretations. The eight certifying officials interviewed who submit nonstandard enrollments to VBA provided the following responses related to reporting vacation breaks:

- Five were not able to show the team where to find the information in the handbook.
- Five reported the date range for the vacation break.
- Three reported the number of days in the vacation break.
- Five correctly stated the requirement to include all consecutive days of the vacation period, including any weekends.
- Five said the information in the handbook is vague.

The OIG concluded that neither the training nor the language in the handbook was sufficient to ensure that school certifying officials understood their responsibilities for reporting vacation breaks. If they do not report this information consistently and correctly, VBA cannot accurately adjust students' education benefits. As part of this audit, the team presented the errors made by school certifying officials to VBA officials, who agreed that these were errors; however, to make the necessary corrections to the students' enrollment, VBA must obtain amended enrollments from the certifying officials.

Claims Examiners Were Not Required to Verify Vacation Breaks

Even if school certifying officials incorrectly reported vacation breaks, some errors could be avoided if VBA claims examiners verified this information either by communicating with certifying officials or comparing it with a calendar. Although verification is not required, it would allow claims examiners to see where school certifying officials underreported vacation breaks by not including adjacent weekends. When the 20 claims examiners were asked if they verified dates, they provided varied responses:

- Eleven said they processed the enrollment received without contacting the certifying official or consulting a calendar.
- Four said they looked at a calendar.
- Three said they reached out to the certifying official.
- Two said they looked at a calendar and contacted the certifying official.

School certifying officials improperly reported vacation breaks for 52 of the 185 enrollments the team reviewed, underreporting 22 enrollments' vacation breaks by excluding adjacent weekends (e.g., weekends after spring break or other holidays). If claims examiners had consulted a calendar for the reported breaks, they might have realized that the school certifying officials had not properly accounted for the seven consecutive days. The incorrect reporting of students' vacation breaks causes undercharged entitlements and loss of monthly housing allowances and college fund payments, as shown in example 2.

Example 2

A student took a class at Metropolitan Community College–Penn Valley, where 12 hours counts as full-time enrollment. The class consisted of three semester hours of learning between March 9 and April 20, 2021 (seven weeks), which included a seven-day vacation break from March 15 through March 21. The school certifying official did not include the weekend in the vacation break period and reported only a five-day break from March 15 to March 19 in the enrollment submitted to VBA. Because the vacation break was less than seven days, the

veteran claims examiner did not enter any break days into the Long Term Solution application to remove them from the student's enrollment, thereby reducing the student's rate of pursuit from 90 percent to 80 percent. As a result, the student was undercharged four days of entitlement and underpaid \$390.10 in total monthly housing allowance.

For the remaining 30 of 52 enrollments in the OIG sample, school certifying officials incorrectly reported or did not report any vacation breaks with the enrollments. Using data analysis and record matching, the audit team was able to determine that vacation breaks were reported for other students attending the same courses for the same period (and were verified against the school calendar and other student enrollments), and therefore should have been reported for the sample enrollments.²⁹ Because the vacation break was not deducted from the students' enrollments, their rates of pursuit were incorrectly calculated, resulting in reduced housing allowance payments and incorrect amounts of class time deducted from their entitlements.

School certifying officials need to be made aware that they are incorrectly reporting vacation breaks. Although VBA conducts compliance surveys (in-person meetings and documentation reviews) to ensure it is providing oversight and accountability for all approved GI Bill education and training institutions, these surveys do not check specifically for official vacation breaks in sampled enrollments.³⁰ VBA is relying on school certifying officials to correctly report this information but provides only limited training, guidance, and oversight. If certifying officials do not report vacation breaks properly, claims examiners cannot accurately update students' education records.

Claims Examiners Did Not Properly Adjust Enrollments with Vacation Breaks

Even when school certifying officials accurately reported vacation breaks, VBA claims examiners often did not correctly process the information. The OIG found for an estimated 1,700 (69 percent) of approximately 2,500 enrollments with errors for which school certifying officials correctly reported vacation breaks, claims examiners made errors such as not reviewing the entire enrollment documentation for notes on vacation breaks.³¹ As a result, for these 1,700 enrollments, VBA undercharged the students in total about 10,000 days of entitled education and underpaid them an estimated \$446,000 in monthly housing allowance and college fund payments. When the audit team presented these errors to VBA regional processing office staff, they agreed and took action to correct all the mistakes made by the claims examiners.

²⁹ Refer to appendix B for additional information on data matching and analysis.

³⁰ VA Education Manual 22-4, part 10, chapter 3.01, b.2, April 5, 2019.

³¹ The estimate is based on the OIG's statistical sample of 185 enrollments, 69 percent of which had errors.

According to VBA's deputy director of operations, because there is no automated form for recording vacation breaks, school certifying officials report vacation breaks in the remarks section of the enrollment, which means that those enrollments are redirected for manual processing by a claims examiner. Claims examiners are required to review the entire enrollment documentation when processing, including the remarks section; however, the review team found that claims examiners often did not record the content, as shown in example 3.

Example 3

A student took a class at Indiana Wesleyan University, which considers 12 hours full-time enrollment. The class consisted of three distance-learning semester hours between November 17, 2020, and January 18, 2021 (nine weeks), which included two vacation break periods totaling 21 days. The school certifying official reported the break periods from November 22 through November 30, 2020, and December 22, 2020, to January 4, 2021, on the student's enrollment in the remarks section. Despite the information being reported, the claims examiner processing the enrollment did not enter the vacation break days into the Long Term Solution application and did not adjust the number of days attended. By not properly accounting for the vacation breaks to reduce attendance, the student's rate of pursuit dropped to half-time, which does not qualify for a monthly housing allowance. As a result, the student was undercharged 16 days of entitlement and underpaid \$1,060.70 in monthly housing allowance. When notified of the error during the audit, VBA corrected the student's record and issued the student a retroactive payment.

Broadly, the audit team found that VBA claims examiners have the knowledge and ability to properly identify and process reported vacation breaks. Based on interviews with the 20 claims examiners, four education quality training specialists, and four supervisory claims examiners from the two regional processing offices, the team found that all 28 were aware of where vacation breaks are reported on student enrollment forms as well as the requirement to process reported breaks of seven or more days. All were also aware of where to find additional resources such as VBA manuals and training materials. When asked, 24 of the 28 employees (86 percent) demonstrated an understanding of the effect that vacation breaks have on student benefits and 20 of the 24 (83 percent) claims examiners and quality training specialists combined confirmed that training is sufficient to perform their roles.

Although VBA employees speculated that production standards and new legislation could have caused the vacation breaks to be missed during processing, the audit team did not find evidence to support these claims. During interviews, 17 of the 28 employees (61 percent) indicated that one reason claims examiners may not have recorded the vacation breaks was that they were rushing through work to meet production standards. However, eight of these 17 employees stated that production standards were attainable.

A number of claims examiners also stated that they were concerned how legislation enacted in the last four years affected their workload.³² One concern was that the legislation requirements occurred after time studies were conducted as part of the production standards development, and therefore were not considered when the standards were created. These legislative changes require claims examiners to take additional steps when processing enrollments, such as sending letters or reviewing information in another VA system not found in The Image Management System or Long Term Solution.³³ While the new legislation may have affected the workload, the audit team did not find that it changed the process of identifying vacation breaks in the remarks of the enrollments. Moreover, having to move quickly to meet production standards cannot excuse the need to accurately process enrollments.

Based on the team's review of student enrollments and interviews with VBA staff, the team found that not only is the process uncomplicated, consisting of reviewing the remarks and recording the number of days in the designated "vacation days" field on the student's enrollment in the Long Term Solution application, but the fact that enrollments with remarks are sent to the claims examiners for manual processing clearly indicates the need to review the remarks carefully and in its entirety. For example, one claims examiner interviewed described "a straightforward process where the claims processor is moving vacation break data reported by the certifying official from one processing program [The Image Management System] to the next [Long Term Solution]." Nevertheless, many claims examiners neglected to take this step.

The OIG concluded that, although claims examiners were sufficiently trained on how to process enrollments, knew the requirements to report and record vacation breaks, and knew where to locate these breaks on the students' enrollments, they were still making many errors when adjusting enrollments for vacation breaks. VBA needs to take steps to ensure that claims examiners increase their accuracy.

VBA Could Improve Its Quality Review Process by Using Data Analysis Techniques to Identify Enrollments with Vacation Break Errors

VBA's local quality review process can also be improved to be more responsive to errors related to how vacation breaks are being reported. Local quality review teams review five enrollments a month for each claims examiner. From August 2020 through March 2021, quality staff at the two regional processing offices conducted reviews on approximately 34,000 enrollments. However, nonstandard term enrollments requiring adjustment for vacation breaks make up a small portion

³² These interviewees referred to 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. 4932-5064 (2021) and the Harry W. Colmery Veterans Educational Assistance Act of 2017, Pub. L. No. 115-48, (2017).

³³ The Image Management System (TIMS) is the scanning system used by VA to scan and store all education documentation.

of total Post-9/11-GI Bill enrollments; therefore, they are unlikely to be selected for quality reviews each month. During the audit review period from August 1, 2020, through April 1, 2021, the total number of enrollments in the Post-9/11 GI Bill program was about 1.4 million, but only around 10,000 (0.007 percent) are nonstandard term enrollments that should be adjusted for vacation breaks. VBA could use data analysis techniques to better identify enrollments with vacation break days, which are more susceptible to errors through manual processing. Quality control reviewers could then focus their efforts on a larger sample of these types of enrollments.

VBA Should Continue to Work on Automating the Adjustment of Education Benefits with Vacation Breaks to Decrease the Opportunity for Errors

Many of the errors described in this report could be prevented if VBA were to use an automated form for reporting vacation breaks, rather than relying on the information entered manually by school certifying officials and then manually processed by claims examiners. The OIG recognizes that VBA officials have indicated that modernization efforts, specifically the Digital GI Bill, will improve the automated processing of education enrollments, including those that contain vacation break periods.³⁴ It is important that automation efforts engage users and monitor timelines.

According to the deputy director of operations, in order to digitize the platforms used to process Post-9/11 GI Bill and other education claims, the Digital GI Bill will replace VBA's VA-ONCE and the Web-Enabled Approval Management System with Enrollment Manager and Institution Manager applications.³⁵ Enrollment Manager, which is slated to be implemented by September 2022, will include a feature to discourage users from entering information into the remarks section, since those enrollments cannot be processed automatically. The deputy director of operations explained that one of the goals of the digitization of the enrollment process is to provide data fields for the information being entered in the remarks section.

If the new digitized enrollment process can be designed so that it captures vacation break information automatically in the Long Term Solution application, enrollments would not need to be manually reviewed and processed by claims examiners. However, even with automating the enrollment certification process, VBA needs to ensure certifying officials are entering accurate information into the digitized system, as previous sections have emphasized.

³⁴ According to a VBA Education Service training presentation, Digital GI Bill® is a modernized digital platform that will provide direct, online, one-stop access to GI Bill benefits for beneficiaries and external partners such as institutions of higher learning.

³⁵ Web-Enabled Approval Management System is a central application that combines the functionality of two existing approval systems, OLAF (On-Line Approval File) and LACAS (Licensing and Certification Approval System). It is used to store VA approval information for organizations offering training to claimants. VBA personnel use this approval information to determine claimant eligibility for benefits for training offered by organizations.

Conclusion

Because VBA uses a manual process to adjust enrollments for vacation breaks, the OIG found that an estimated 2,500 enrollments between August 1, 2020, and April 1, 2021, had vacation break processing or reporting errors, resulting in an estimated \$624,000 in monthly housing allowance underpayments.³⁶ As long as VBA relies on this process, it must take steps to ensure that school certifying officials are well trained, have adequate guidance, and receive feedback on the mistakes they make when manually entering vacation breaks on students' enrollments. VBA must also ensure that claims examiners are correctly handling enrollments where vacation breaks are noted in the remarks. Ultimately, however, VBA needs to continue its efforts to move to an automated process that precludes manual entry, which is prone to error. The agency should also improve its quality review process through data analysis and record matching, so that reviewers can focus on these types of relatively uncommon adjustments. Unless VBA makes these changes, students are at risk of inaccurate entitlement calculations and not receiving the correct value of their education benefit.

Recommendations 1–5

The OIG recommends that the acting under secretary for benefits take the following actions:

1. Update the School Certifying Official Handbook and consider other training aids to ensure how to calculate and report vacation breaks is clearly detailed.
2. Develop and implement procedures for claims examiners to verify that all consecutive days are included in enrollments flagged for manual processing containing reported vacation breaks in the remarks section.
3. Obtain amended enrollments from school certifying officials to correct vacation break reporting errors identified during this review and take remedial action when appropriate.
4. Apply data analysis and record matching to identify enrollments with possible vacation break reporting errors made by school certifying officials, or processing errors by claims examiners.
5. Include in the development of the new automated system fields for vacation breaks to eliminate the need for manual processing.

VA Management Comments

The acting under secretary for benefits concurred with recommendations 1 through 5 and provided action plans for all recommendations. The actions proposed by VBA are detailed in appendix D. VBA's responses to the recommendations follow:

³⁶ Appendix C presents the underpayments estimate as a questioned cost.

- **Recommendation 1.** The School Certifying Official Handbook will be updated to provide clear guidance on how and when to report vacation breaks and training will be provided to certifying officials to review updates. The planned completion date for the update is June 30, 2022.
- **Recommendation 2.** A procedural advisory combined with related training will outline steps for claim examiners to ensure vacation break periods are properly reported and considered. The target completion date for planned actions is July 31, 2022.
- **Recommendation 3.** Education Service is obtaining amended enrollments from school certifying officials to correct vacation break errors identified from the audit. The target completion date for these corrections is April 30, 2022.
- **Recommendation 4.** VBA is recreating the OIG data analysis to identify enrollments and claimants with possible vacation break reporting errors. VBA will pull data for academic year August 1, 2021, to January 31, 2022 (six months). The data analysis will include a special focus review by the Education Service Quality Assurance Team to review a sample of enrollments. The planned actions are proposed to be completed by May 31, 2022.
- **Recommendation 5.** A field for vacation breaks allowing automatic processing is being built as part of the Digital GI Bill's Enrollment Manager module. Enrollment Manager is a new school certifying official facing platform that will streamline the claims processing functionality. The target completion date for planned actions is September 30, 2023.

The acting under secretary for benefits also provided 19 technical comments, which the OIG addressed below and throughout the report. These VBA comments are also found in full in appendix D.³⁷

OIG Response

The corrective action plans for recommendations 1 through 5 are responsive to the intent of these recommendations. The OIG will monitor implementation of all the recommendations by VBA and will close the recommendations when it receives sufficient evidence demonstrating progress in addressing the recommendations.

As to VBA's 19 general and technical comments, the OIG addressed them in the text or footnotes to the narrative.

³⁷ VBA comments on the report in appendix D are not numbered, but OIG refers to these comments as 1-19, in the order they are presented in appendix D.

The team made requested changes to the report when additional support was provided. Specifically, the team clarified report language based on VBA's technical comments 3, 5–9, 11–15, and 19.

In other instances, the audit team made some, but not all, of the suggested changes. For example, for **comment 1**, VBA's acting under secretary stated that the report was unclear on whether graduate students were included in the sample and extrapolations. He asserted that if they were, the results might be skewed. The OIG followed the School Certifying Official Handbook dated March 2021. This version of the handbook did not explicitly distinguish how to consider graduate school vacation breaks in equivalent credit hour calculations for students in nonstandard terms when a full-time modifier was used.³⁸ Therefore, undergraduate and graduate students were treated similarly for the case review. The OIG sample included both graduate (4) and undergraduate (181) students. Further, after the OIG conducted its case review with vacation break errors and provided them to VBA (on June 24, 2021), VBA education staff concurred with these errors (on August 1, 2021). The handbook was subsequently updated in October 2021 and no longer requires VBA to determine the equivalent credit hour calculation for nonstandard terms for graduate training, as contended in VBA's comments. Given the relatively small number of graduate students, the OIG asserts that including graduate students in the sample and extrapolation would not fundamentally change the audit's findings.

For **comments 2 and 4**, the acting under secretary asserted that the OIG gave an incorrect amount for the enlistment bonus. The OIG used the term "enlistment bonus" generically to describe any payments received as enlistment or reenlistment, which may include a GI Bill kicker (also known as college fund). In this final report, the OIG replaced the term "enlistment bonus" with "college fund" to avoid confusion. However, the OIG correctly stated that the highest amount paid for the college fund is \$350. The acting under secretary presumed the inclusion of the \$600 Buy Up program, which is an option the enlistee may take to increase the monthly payment to as much as \$950. However, in the report, the OIG refers to the college fund exclusively, independent of the \$600 Buy Up program, and therefore did not change the amount.

For **comment 10**, the acting under secretary took issue with the removal of vacation breaks in the calculation of rate of pursuit and entitlement shown in table 1. The table is consistent with the VA formula that the acting under secretary provided, and for students 1 through 3 it does not remove vacation breaks, as none are included. Only student 4 has vacation breaks removed, as listed in the column heading.

For **comment 16**, VBA asserted that according to VA's Education Manual, compliance surveys incorporate a review of the academic calendars to include vacation periods. While the team acknowledges this statement, the manual section cited instructs the surveyor to review vacation

³⁸ A full-time modifier is the school's minimum number of credit hours required to be considered full-time for a semester, quarter or any individually defined training period, and is published in the school's catalog.

periods in the approval file. As the OIG stated, the manual does not refer to reviewing vacation breaks in the sample enrollments during the compliance survey. Further, the manual does not instruct the surveyor to confirm that vacation days are reported on the sample enrollments being reviewed. Therefore, the OIG did not revise report language related to this comment.

For **comment 17**, VBA noted that out-of-scope students determined to still be full-time, after the rate of pursuit was determined, were apparently excluded from the sample. The acting under secretary stated that “if the intent was to analyze only those determined to have [a rate of pursuit] less than full-time upon initial enrollment due to not excluding the vacation period, the statement is acceptable.” The OIG agrees with VBA’s statement and since the team excluded students determined to still be full-time after the rate of pursuit was determined, no changes were needed to the report.

For **comment 18**, VBA interpreted that the entitlement days in table B.5 were determined based on actual days in term, rather than the 30-day month that is used, and as a result asserted that the table may need revision. However, the OIG used the 30-day month calculation; therefore, no revision to the table was necessary. The OIG added a footnote explaining the 30-day month calculation that was applied.

The information in the report was based on guidance applicable during the team’s data collection period: May 2021 through June 2021.

Appendix A: Scope and Methodology

Scope

The audit team conducted its work from May 2021 through February 2022. The team reviewed a sample of enrollments requiring reported vacation breaks from August 1, 2020, through April 1, 2021 (the review period).

Methodology

To accomplish the audit objective, the OIG team identified and reviewed regulations, policies, procedures, and guidelines related to processing Post-9/11 GI Bill enrollments. The team interviewed supervisors and staff at VBA's regional processing offices and the Education Service to obtain information about training and processing enrollments with vacation breaks. The team performed virtual site visits at the regional processing offices in Buffalo, New York, and Muskogee, Oklahoma.

The OIG team conducted interviews with regional processing offices' veterans claims examiners, supervisors, and education quality training specialists as well as Education Service's deputy director of operations, deputy director of program management, chief of quality assurance, and chief of approvals, compliance, and liaison team. In addition, the team interviewed school certifying officials to obtain information about processing and submitting Post-9/11 GI Bill student enrollments.

With an OIG statistician's guidance, the team reviewed a random sample of Post-9/11 GI Bill enrollments that should have had vacation breaks reported based on other students' enrollments at the same school with the same term. The team used VBA's electronic systems, including the Long Term Solution application and The Image Management System, to assess whether the vacation breaks were reported and recorded accurately.

Internal Controls

The audit team assessed the internal controls of VBA's Education Service significant to the audit objective. This included an assessment of the five internal control components: control environment, risk assessment, control activities, information and communication, and monitoring. In addition, the team reviewed the internal control principles associated with the objective. The team identified the following two components and two principles as significant to the objective. The team identified internal control weaknesses during this audit and made recommendations to address the following control deficiencies:

- Component: Control Activities
 - Principle 10: Selecting and Developing Control Activities

- Information and Communication
 - Principle 13: Using Relevant Information

VBA has internal controls in place to mitigate risks involved in benefits claims processing and school enrollment submission. Education Service’s national quality team and the local processing office’s quality review team both monitor claims processing performance and conduct quality checks on a monthly basis. Quality review checks conducted on schools in the form of compliance surveys are completed in order to ensure that the schools and training establishments (as well as their courses) are in compliance with the laws administered by the VBA. However, none of these control activities are effectively limiting the errors made by VBA claims examiners or school certifying officials when processing vacation breaks. Because vacation breaks are only a small portion of the overall information contained in enrollments, they are either omitted or improperly processed by both the schools and the VBA regional processing offices.

Fraud Assessment

The audit team assessed the risk that fraud and noncompliance with provisions of laws, regulations, contracts, and grant agreements, significant in the context of the audit objectives, could occur during this audit. The team exercised due diligence in staying alert to any fraud indicators by

- soliciting the OIG’s Office of Investigations for indicators,
- reviewing OIG hotlines complaints and concerns for indicators,
- reviewing notes and documentations of sampled cases for indicators, and
- conducting fraud assessments to identify fraud risks significant to the objective.

The OIG did not identify any instances of fraud or potential fraud during this audit.

Data Reliability

The audit team used computer-processed data from VBA’s Corporate Database. To test for reliability, the team determined whether any data were missing from key fields, included any calculation errors, or were outside the time frame requested. The team also assessed whether the data contained obvious duplication of records, alphabetic or numeric characters in incorrect fields, or illogical relationships among data elements. Furthermore, the team compared students’ names and social security numbers for 10 Post-9/11 GI Bill education enrollments from the VBA Corporate Database to the information in the Long Term Solution application and The Image Management System.

Testing disclosed that the data were sufficiently reliable for the audit objective. Comparison of the data with information in the VA Long Term Solution application and The Image Management System records reviewed did not disclose any problems with data reliability.

Government Standards

The OIG conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that the OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objective. The OIG believes the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objective.

Appendix B: Statistical Sampling Methodology

Approach

To accomplish the objective, the audit team reviewed a statistical sample of Post-9/11 GI Bill enrollments that could require vacation breaks to be reported from August 1, 2020, through April 1, 2021. The team used statistical sampling and stratified the population by the regional processing office where the enrollments were processed to quantify the extent of records where VBA employees did not remove required vacation breaks from students' term enrollment period.

Population

The OIG team used criteria found in the School Certifying Official Handbook and Education Manual to define the population and identify only nonstandard enrollments that could require vacation break periods to be reported for review.³⁹ This resulted in 10,183 student enrollments from August 1, 2020, through April 1, 2021. The team conducted further data analysis to focus the audit population and identify enrollments for which vacation break periods potentially should have been reported but were not, indicating a potential processing or reporting error. This process included key word searches of the enrollment remarks for terms related to vacation breaks and data matching to compare enrollments for students attending the same institutions of higher learning and programs for the same term where one had vacation breaks reported but not others. The application of the population definitions and data analysis resulted in an audit population of 2,843 student enrollments.

The team found out-of-scope samples during the review of enrollments. Because of these, it estimated that, from the population of 2,843, about 2,688 enrollments were within the scope of this audit. Table B.1 shows the estimated number of in-scope enrollments.

³⁹ VA Education Manual 22-4, part 12, chap. 33, subchapter 2, "Eligibility," August 24, 2018.

Table B.1. Estimated In-Scope Enrollments

Enrollment	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
In scope (Percent)	2,688 (95)	93 (3)	2,595 (91)	2,781 (98)	185	2,700
Out of Scope (Percent)	155 (5)	93 (3)	62 (2)	248 (9)	11	150
Total (Percent)	2,843 (100)	-	-	-	196	2,800

Source: VA OIG statistician.

Sampling Design

The audit team selected a sampling unit that is a randomly selected single enrollment term per student match that was processed without vacation breaks. The population was stratified by regional processing office and categorized in two strata. A random sample of 185 enrollments from the population of enrollments was reviewed based on an expected error rate of 50 percent. The sample enrollment number represents total enrollments reviewed at each regional processing office as seen in table B.2.

Table B.2. Sample Strata

Regional processing office	Sample enrollments
Muskogee	105
Buffalo	80
Total	185

Source: VA OIG statistician's stratified population.

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 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 does not significantly change as more enrollments are added to the sample review.

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

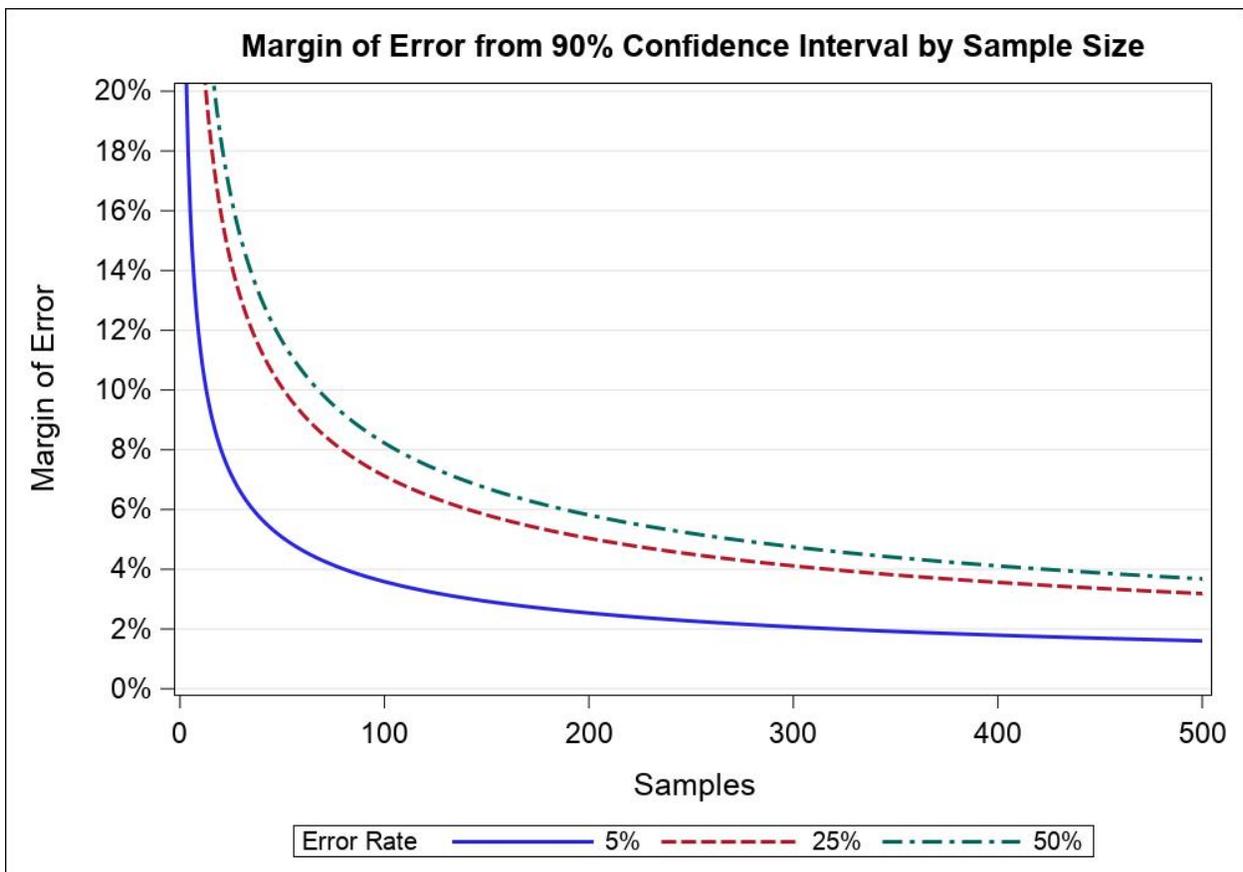


Figure B.1. Effect of sample size on margin of error.

Source: VA OIG statistician’s analysis.

Projections

Table B.3 shows the projection for the number of enrollments by outcome in the population at the time of review. Projected total count reflects the total number of projected enrollments.

Table B.3. Statistical Projections for Number of Enrollments Error

Review outcome	Estimated number of enrollments	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Error (Percent)	2,519 (94)	132 (4)	2,388 (90)	2,651 (97)	176	2,500
No error (Percent)	169 (6)	99 (4)	70 (3)	268 (10)	9	170
Total (Percent)	2,688 (100)	93	2,595	2,781	185	2,700

Source: VA OIG statistician’s projection of the number of enrollments by review outcome, based on the team’s sample data analysis.

Note: Numbers in table may not sum due to rounding.

Table B.4 shows the projection for the number of enrollments with errors made by VBA staff (processing errors) and school certifying officials (reporting errors) in the population at the time of review. Projected total count reflects the total number of projected enrollments.

Table B.4. Statistical Projections Summary for Enrollment Error Type

Type of error	Estimated number of enrollments	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
VBA processing error (Percent)	1,733 (69)	200 (7)	1,533 (62)	1,934 (76)	124	1,700
School reporting error (Percent)	786 (31)	184 (7)	602 (24)	969 (38)	52	790
Total (Percent)	2,519 (100)	132	2,388	2,651	176	2,500

Source: VA OIG statistician’s projection of the number of enrollment error type, based on the team’s sample data analysis.

Note: Numbers in table may not sum due to rounding.

Table B.5 shows the projection for the number of entitlement days undercharged with percentage of the population at the time of review. The projected total count reflects the total number of projected entitlement days.⁴⁰

Table B.5. Summary of Projections and Confidence Intervals for Entitlement Days Undercharged by Error Type

Error type	Projected total count of enrollment days undercharged	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Processing error	10,049	1,751	8,298	11,800	89	10,000
Reporting error	4,334	1,368	2,966	5,702	41	4,300
Total	14,383	1,774	12,609	16,157	130	14,400

Source: VA OIG statistician’s projection of the number of enrollments where entitlement days were undercharged by error type, based on the team’s sample data analysis.

Note: Numbers in table may not sum due to rounding.

Table B.6 on the following page shows the projected amount of underpaid monthly housing allowance and college fund payments by error type.⁴¹

⁴⁰ See VBA technical comment 18, “Page 24, last paragraph,” on page 37. According to the VA School Certifying Official Handbook (Online), “Benefit Payments,” March 5, 2021, VBA counts each month as having 30 days regardless of the actual number of calendar days, resulting in 360 days of entitlement in a calendar year (12 x 30 = 360).

⁴¹ See VBA technical comment 19, “Page 25, Table B.6,” on page 38. College fund payments, also known as GI Bill kicker payments, must be used in conjunction with the GI Bill. These payments are added to the veteran’s monthly housing allowance. The college fund payments can be worth up to \$350 per month, depending on length of enlistment contract, service joined, chosen job, and place of service.

Table B.6. Summary of Projections and Confidence Intervals for Underpaid Monthly Housing Allowance and College Fund Payments by Error Type

Error type	Total under-payments	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Processing error	\$446,394	\$115,259	\$331,135	\$561,653	124	\$446,000
Reporting error	\$177,753	\$87,201	\$90,552	\$264,954	52	\$178,000
Total	\$624,147	\$133,088	\$491,059	\$757,234	176	\$624,000

Source: VA OIG statistician's projection of the number of enrollments errors by type based on the team's sample data analysis.

Note: Numbers in table may not sum due to rounding.

Appendix C: Monetary Benefits in Accordance with Inspector General Act Amendments

Recommendation	Explanation of Benefits	Better Use of Funds	Questioned Costs
1-5	The OIG found underpayments to veterans and other entitled beneficiaries in monthly housing allowance occurred due to incorrect certifying and processing of students' enrollments with vacation break periods.	\$0	\$624,000
	Total		\$624,000

Source: VA OIG analysis.

Appendix D: VBA Management Comments

Department of Veterans Affairs

MEMORANDUM

Date: March 21, 2022

From: Under Secretary for Benefits (20)

Subj: OIG Draft Report – Audit of VBA’s Processing of Post-9/11 GI Bill School Vacation Breaks Affects Beneficiary Payments and Entitlement. [Project No. Project #2021-02437-AE-0108] – VIEWS 05818600

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

Attached is VBA’s response to the OIG Draft Report: Audit of VBA’s Processing of Post-9/11 GI Bill School Vacation Breaks Affects Beneficiary Payments and Entitlement.

The OIG removed point of contact information prior to publication.

/s/

Thomas J. Murphy

Director Northeast District, Veterans Benefits Administration, Performing the Delegable Duties of the Under Secretary for Benefits

Attachment

Veterans Benefits Administration (VBA)

Comments on OIG Draft Report

Audit of VBA's Processing of Post-9/11 GI Bill School Vacation Breaks Affects Beneficiary Payments and Entitlement

VBA provides the following **technical comments**:

Executive Summary Page i, paragraph 2:

"Post-9/11 GI Bill benefits may be used to fund education occurring in both standard semesters and nonstandard terms—those that are shorter or longer than a standard quarter or semester. For nonstandard terms, VBA claims examiners must deduct student vacation breaks from Post-9/11 GI Bill benefits if they total seven days or more.² These vacation breaks vary by school and by program. Students should not be counted as being in the classroom for the time they spend on vacation."

VBA Comment: Vacation days are excluded only from the non-standard terms of undergraduate students to determine the equivalent credit hour calculation. The report isn't clear whether graduate students were included in the sample and extrapolations. If so, the results may be skewed.

Executive Summary Page i, footnote 1:

"Enlistment bonus payments must be used in conjunction with the GI Bill. These payments are added to the veteran's monthly housing allowance. The enlistment bonus can be worth up to \$350 per month, depending on length of enlistment contract, service joined, chosen job, and place of service."

VBA Comment: The footnote is incorrect. Enlistment bonuses are paid in cash by the Department of Defense (DoD) and are not part of the Post-9/11 GI Bill. The dollar amounts are dependent on the service branch, specific job specialty and length of enlistment contract. The GI Bill kicker, also known as the College Fund, is an additional amount of money that increases an individual's basic monthly education benefit and is included in his or her monthly GI Bill payment from the VA. It too is awarded based on service branch, job specialty, etc. The highest amount is currently \$950.00.

Page 1, paragraph 2:

"Students enrolled in a Post-9/11 GI Bill program may be eligible to receive up to 36 months of education benefits, which can include tuition, a monthly housing allowance for full-time students, and enlistment bonus payments.⁸ The 36 months are equivalent to 1,080 days, and benefits received (also known as entitlement) are converted to or calculated in days and subtracted from (charged against) that total.⁹ For example, students attending an institution of higher learning are charged one day of entitlement for each day of learning. 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."

VBA Comment: This suggests that housing is paid only for full time students. Housing is paid when the rate of pursuit is greater than 50 percent (and not on active duty).

Page 1, footnote 8:

"Enlistment bonus payments must be used in conjunction with the GI Bill. These payments are added to the veteran's monthly housing allowance. The enlistment bonus can be worth up to \$350 per month, depending on length of enlistment contract, service joined, chosen job, and place of service."

VBA Comment: Footnote 8 is incorrect. Enlistment bonuses are paid in cash by DoD and are not part of the Post-9/11 GI Bill. The dollar amounts are dependent on the service branch, specific job specialty and length of enlistment contract. The GI Bill kicker, also known as the College Fund, is an additional amount

of money that increases an individual's basic monthly education benefit and is included in his or her monthly GI Bill payment from the VA. It too is awarded based on service branch, job specialty, etc. The highest amount is currently \$950.00.

Page 3, paragraph 2:

"The Post-9/11 GI Bill monthly housing allowance is paid if the rate of pursuit is more than 50 percent.¹⁶ Monthly housing allowance payments are based on the student's rate of pursuit, rounded up or down to the nearest 10 percent. For example, a student with a rate of pursuit of 67 percent would be paid at 70 percent of the total monthly housing allowance for the student's area of residence. That rate is multiplied by days of instruction or training."

VBA Comment: Suggest that this paragraph also reference that the housing allowance will be prorated if the student's eligibility tier is less than 100 percent.

Page 3, paragraph 3:

"For Post-9/11 GI Bill students attending institutions of higher learning, VBA bases entitlement charges on the number of days of school and whether students attend full-time or part-time.¹⁷ For example, if a full-time student attends school for 12 months, the student uses 12 months (or 365 days) of entitlement. The amount of entitlement charged is determined by multiplying the student's rate of pursuit by the total number of days in the enrollment term without deducting vacation breaks."

VBA Comment: Entitlement is charged based on 30-day months, therefore 12 months at full time equates to 360 days of entitlement, not 365 as stated. Rate of Pursuit (RoP) is determined using actual days of instruction in the term, but entitlement is charged based on 30-day months. For example: A term that starts on 1/1 through 4/1, full-time entitlement charge is 30 days for January, 30 days for February and 30 days for March.

Page 3, paragraph 3, last sentence:

"The amount of entitlement charged is determined by multiplying the student's rate of pursuit by the total number of days in the enrollment term without deducting vacation breaks."

VBA Comment: Vacation days are not considered for undergraduate students during standard terms (10-13 weeks at quarter schools/15-18 weeks at semester schools) but should be deducted from non-standard terms. In all instances, the entitlement charged is based on 30-day months, not actual days.

Page 4, paragraph 1, first sentence:

"When claims examiners do not account for vacation breaks by deducting them from the enrollment term, the rate of pursuit is reduced, essentially treating students as if they have a lower course load than they actually have."

VBA Comment: Suggest inserting "nonstandard" in this sentence to read as follows:

"When claims examiners do not account for vacation breaks by deducting them from the nonstandard enrollment term, the rate of pursuit is reduced, essentially treating students as if they have a lower course load than they actually have."

Page 4, Table 1:

Table 1. Rate of Pursuit and Entitlement Calculation Examples

Calculation	Student 1 standard term (16 weeks)	Student 2 standard term (16 weeks)	Student 3 nonstandard term (eight weeks)	Student 4 nonstandard term (eight weeks with two-week vacation break)
1. Determine the number of days in the certified term . Remove vacation break, where applicable, and multiply number of weeks by seven	112	112	56	42
2. Record the student's number of credit hours per term (quarter hours)	8	4	6	6

VBA Comment: The headers for the 2nd and 3rd columns in Table 1 are incorrect. Student 1 and Student 2 would only be in standard terms at semester schools and 16 weeks is a nonstandard term at quarter schools. Request to change to semester vs. quarter. Semester terms are 15-19 weeks in length and quarter terms are 10-13 weeks.

Page 4, Table 1, Row 1:

1. Determine the number of days in the certified term . Remove vacation break, where applicable, and multiply number of weeks by seven	112	112	56	42
---	-----	-----	----	----

VBA Comment: The correct formula VA uses is: “VA will begin by calculating the number of weeks in the period certified. VA will count the number of days in the enrollment period (first day through the last day) and divide by 7.” VA will disregard a remainder of 3 days or less or count a remainder of 4 days or more as an additional full week.

For example: 112 days divided by 7 would be 16 weeks. If there are 16 weeks during a semester you wouldn't remove vacation days as this is a standard term and wouldn't need the formula.

Page 4, Table 1:

2. Record the student's number of credit hours per term (quarter hours)	8	4	6	6
--	---	---	---	---

VBA Comment: Please clarify the reference to quarter hours in parentheses. Semester or quarter hours are options that impact the outcome. This example appears to be using semester hours.

Page 4, Table 1, Row 5:

Calculation	Student 1 standard term (16 weeks)	Student 2 standard term (16 weeks)	Student 3 nonstandard term (eight weeks)	Student 4 nonstandard term (eight weeks with two-week vacation break)
5. Determine percentage of monthly housing allowance payment by rounding rate of pursuit to the nearest 10%	70%	Not eligible for monthly housing allowance since rate of pursuit < 51%	80%	100%

VBA Comment: Student 2 is not entitled to housing because RoP is less than 50 percent. The table indicates housing isn't authorized because RoP is less than 51 percent. RoP of 50.01 percent through 54.99 percent does pay housing at the 50 percent rate.

Page 5, Table 1, Row 6:

6. Determine the number of (whole) days of entitlement charged by multiplying the number of days by the rate of pursuit	75	37	42	56*
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VBA Comment: The entitlement charged can't be determined without knowing the actual term dates since it's charged on 30-day months which might differ from actual days in term. (It's not 1 to 1.)

Page 5, paragraph 1, fifth sentence:

"Therefore, VBA's claims examiners must manually process student enrollments by reviewing the remarks section and entering the number of vacation break days into the Long Term Solution application."

VBA Comment: Not all enrollments with remarks are redirected. Some standard remarks are automated. All nonstandard remarks are worked manually.

Page 6, Figure 1, Enrollment process flowchart:

VBA Comment: The flowchart states, "If there are no remarks, the enrollment is **processed automatically**". Remarks are not the only factor for automated processing. The statement in the flow chart should be revised to say the following on Page 6, Figure 1, "If there are remarks for vacation break periods, the enrollment is redirected for manual processing."

Page 13, paragraph 3:

"School certifying officials need to be made aware that they are incorrectly reporting vacation breaks. Although VBA conducts compliance surveys (in-person and documentation reviews) to ensure it is providing oversight and accountability for all approved GI Bill education and training institutions, these surveys do not check specifically for official vacation breaks in its sampled enrollments.²⁵ VBA is relying on school certifying officials to correctly report this information but only provides limited training, guidance, and oversight. If certifying officials do not report vacation breaks properly, claims examiners cannot accurately update students' education records."

VBA Comment: Compliance surveys do incorporate review of the academic calendars to include vacation periods. This is spelled out in the Education Service manual [M22-4 Part 10, Ch3.01 Preparation for Survey, b.2](#).

Page 21, Appendix B, paragraph 3:

"The team found out-of-scope samples during the review of enrollments. Because of these out-of-scope samples, it estimated that, from the population of 2,843, only 2,688 enrollments were within the scope of this audit. Table B.1 shows the estimated number of in-scope enrollments."

VBA Comment: It appears that students determined to still be full-time, after the RoP was determined, were excluded from the sample. If the intent was to analyze only those determined to have RoP less than full-time upon initial enrollment due to not excluding the vacation period, the statement is acceptable. However, School Certifying Officials are always required to report vacation periods of 7 days or more for undergraduate training in non-standard terms. Failure to do so is a reporting error. Further, if a full-time student reduced their credit load during the term and the vacation period was unreported, that student's subsequent RoP would be incorrect.

Page 24, last paragraph:

"Table B.5 shows the projection for the number of entitlement days undercharged with percentage of the population at the time of review. The projected total count reflects the total number of projected entitlement days."

VBA Comment: This document indicates entitlement days were determined based on actual days in term, rather than the 30-day month charge that is used. The projected data in Table B.5 may need revisions.

Page 25, Table B.6:

Table B.6. Summary of Projections and Confidence Intervals for Underpaid Monthly Housing Allowance and Enlistment Bonus Payments by Error Type

VBA Comment: It's unclear how underpayment amounts were determined. The draft references \$350.00 as the maximum kicker amount, when the range extends to \$950.00. Also, was the sample adjusted for students at varying eligibility benefit levels? This report is silent on eligibility benefit levels as a factor in housing payment amounts.

The following comments are submitted in response to the recommendations to the Under Secretary for Benefits in the OIG draft report:

Recommendation 1: Update the School Certifying Official Handbook and consider other training aids to ensure how to calculate and report vacation breaks is clearly detailed.

VBA Response: Concur. The School Certifying Official (SCO) Handbook will be updated to provide clear guidance on how and when to report vacation breaks. When the update is published, the elucidated process will be addressed in the next office hours training session for SCOs.

Target Completion Date: June 30, 2022

Recommendation 2: Develop and implement procedures for claims examiners to verify that all consecutive days are included in enrollments flagged for manual processing containing reported vacation breaks in the remarks section.

VBA Response: Concur. In conjunction with the updated information in the SCO Handbook noted above, a procedural advisory will outline the necessary steps a claims processor must take to determine whether reported vacation periods are accurate and properly considered. Related training will be provided to ensure compliance with the new procedures.

Target Completion Date: July 31, 2022

Recommendation 3: Obtain amended enrollments from school certifying officials to correct vacation break reporting errors identified during this review and take remedial action when appropriate.

VBA Response: Concur. VBA Education Service is in the process of obtaining the enrollments from SCOs to correct vacation breaks identified during the audit. Once complete, the list will be provided to OIG including VBA's response.

Target Completion Date: April 30, 2022

Recommendation 4: Apply data analysis and record matching to identify enrollments with possible vacation break reporting errors made by school certifying officials or processing errors by claims examiners.

VBA Response: Concur. VBA is recreating the data analysis pull to identify enrollments and claimants with possible vacation break reporting errors. VBA will complete a data pull in arrears (6 months) for academic year August 1, 2021, to January 31, 2022. The data analysis will include a special focus review by the Education Service Quality Assurance Team to conduct a statistically valid sample of the report and analyze any potential corrective actions.

Target Completion Date: May 31, 2022

Recommendation 5: Include in the development of the new automated system fields for vacation breaks to eliminate the need for manual processing.

VBA Response: Concur. This functionality is being built as part of Digital GI Bill's Enrollment Manager module. Enrollment Manager is a new SCO-facing platform that will streamline claims processing functionality.

Target Completion Date: September 30, 2023

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

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