US DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL

Office of Audits and Evaluations

VETERANS BENEFITS ADMINISTRATION

Review of Veteran Students' Post-9/11 GI Bill Education Benefits at George Washington University

Review | 26-02655-240 | November 4, 2026



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Executive Summary

In response to a request from House Veterans' Affairs Subcommittee on Economic Opportunity Chairman Derrick Van Orden, the VA Office of Inspector General (OIG) reviewed the accuracy of Post-9/11 GI Bill monthly housing allowances and Yellow Ribbon Program scholarship payments from August 2025 through April 2026 (the 2026 academic year) for George Washington University (GWU) students who were receiving VA education benefits. The subcommittee made the request because some students in the accelerated Master of Business Administration (MBA) program were concerned that their enrollment was not being certified correctly, keeping them from receiving the maximum monthly housing allowance from VA. Also, according to the subcommittee's request, these students believed all tuition would be covered by either the GI Bill or the Yellow Ribbon Program, but the university notified them that it may not have enough funding to cover their summer term, leaving them responsible for remaining tuition costs.

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 eligible veterans, as well as their beneficiaries such as spouses and children, pay for school or job training.[1] The Yellow Ribbon GI Education Enhancement Program (Yellow Ribbon Program) is a provision of the Post-9/11 GI Bill. It allows an institution of higher learning to voluntarily enter into an agreement with VA to fund tuition expenses that exceed the highest public in-state undergraduate tuition rate. For all VA education programs, it is important that those benefits are delivered accurately so that the risk of fraud, waste, or abuse of taxpayer dollars is mitigated and so that veteran and beneficiary students receive the benefits they are entitled to.

The OIG found GWU generally ensured veteran and beneficiary student enrollments were accurate and VA education benefits were received appropriately. As a result, the OIG did not make recommendations based on its review. While GWU's accelerated MBA program is transitioning into a new program in the future, the results of this review can inform future programs the university develops, especially those that rely on nonstandard academic terms (that is, those that are shorter or longer than a standard academic term). In October 2026, the principal deputy under secretary for benefits, performing the delegable duties of the under secretary, concurred with the OIG's findings.

[1] 38 U.S.C. § 3313. 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.

What the Review Found

Students in both the accelerated MBA program and those in other GWU programs generally received accurate monthly housing allowances and Yellow Ribbon Program scholarship funding they were entitled to during the 2026 academic year.

While GWU's school certifying officials and the OIG determined the students' enrollments were certified correctly, the review team identified confusion between some veteran students and the university regarding full-time enrollment, which led to the perception that benefits were not being received as they should have been. Although students in the accelerated MBA program were considered full time by the university, the program operated in nonstandard terms (shorter or longer than a standard term), so the students' rate of pursuit (percentage of course load compared to what the school considers a full-time schedule) varied throughout the terms and did not always entitle students to a maximum housing allowance payment, according to VA's calculation requirements.

Furthermore, because of the accelerated program's cost and structure, the students' Post-9/11 GI Bill benefits and Yellow Ribbon funding were not sufficient to cover the full annual cost of the program. Consequently, students had to decide whether to pause their courses for the summer or pay out of pocket. If they paused their courses, they would not have been eligible for any housing allowance.

Because academic programs that rely on nonstandard terms can create confusion, GWU staff should consider consulting with their Office of Military and Veteran Student Services when developing new programs. By doing so, they can identify the impact of course credits and dates on VA benefits and communicate these effects to eligible students. They should also seek approval from VBA or the state approving agency for programs that differ in structure and schedule from other previously approved programs. These steps will help limit unexpected education costs for students eligible for VA education benefits.

Next Steps

The OIG is not making recommendations for additional actions based on this review but will monitor VBA's planned Digital GI Bill initiatives related to nonstandard terms and Yellow Ribbon Program certifications.



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Contents

Executive Summary i

Abbreviations iv

Introduction 1

Results 5

Finding: GWU Veteran and Beneficiary Students Generally Received Accurate VA Education Benefits 5

Appendix A: Scope and Methodology 19

Appendix B: Post-9/11 GI Bill Monthly Housing Allowance Calculation 21

Appendix C: VA Management Comments 25

OIG Contact and Staff Acknowledgments 27

Report Distribution 28

Abbreviations

GWU	George Washington University
MBA	Master of Business Administration
OIG	Office of Inspector General
VBA	Veterans Benefits Administration

Introduction

In May 2026, the House Veterans' Affairs Subcommittee on Economic Opportunity Chairman Derrick Van Orden requested the VA Office of Inspector General (OIG) review an allegation that certain veterans enrolled in programs at George Washington University (GWU) were receiving "the incorrect amount of the Monthly Housing Allowance (MHA) they are entitled to under the law despite the school seeking full tuition and fee payment under the Post-9/11 GI Bill."[2] Specifically, six of seven students in the university's accelerated Master of Business Administration (MBA) program shared concerns with the GWU School of Business that their enrollment was not being certified correctly, keeping them from receiving the maximum monthly housing allowance from VA.

The request also noted these students believed all tuition for the academic year would be covered by either the Post-9/11 GI Bill or the Yellow Ribbon Program. However, they received notification from the university that it may not have enough funding to cover their summer term, leaving the students responsible for paying remaining tuition costs. Finally, in addition to reviewing the accelerated MBA students' concerns, the subcommittee asked the OIG whether similar concerns were experienced in other programs at GWU.

The VA OIG conducted this review to evaluate the allegation and to respond to the following eight questions from the House Veterans' Affairs Subcommittee on Economic Opportunity:

1. *Are there any student veterans that are enrolled as full-time students at GWU that are only receiving half of their monthly housing allowance?*
2. *Since the program began in 2019, have there been other student veterans who have not received their full monthly housing allowance despite being full-time students? If so, have these students previously flagged the issue for GWU's leadership and was the situation remedied?*
3. *Is the same issue occurring, or has it occurred, in other accelerated graduate and nongraduate programs offered by GWU? If so, how is or has GWU handling the situation?*
4. *Why is GWU telling students that they may owe thousands of dollars to complete their program when the school's own advertising shows that the Yellow Ribbon Program at GWU is unlimited? Is this a violation of their Yellow Ribbon Program agreement with VA?*

[2] US Rep. Derrick Van Orden, letter to the Honorable Cheryl Mason, VA OIG Inspector General, May 8, 2026.

5. *How will GWU student veterans currently enrolled receive back-pay? How will VA and GWU address students that did not receive the full monthly housing allowance they were entitled to in the past?*
6. *Did GWU account for their recent tuition increase with the Yellow Ribbon Scholarships?*
7. *How does GWU's advertising and marketing for these student veteran programs compare to the actual treatment that student veterans received once they were enrolled?*
8. *What internal controls or oversight mechanisms are in place to prevent errors or delays in VA reporting at GWU?*

VA's Post-9/11 GI Bill

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 eligible veterans, as well as their spouses and their children (beneficiaries), pay for school or job training.[3] Individuals enrolled in a Post-9/11 GI Bill program may be eligible to receive 36–48 months of full-time educational benefits (also known as entitlement), which can include tuition, a stipend for books and supplies, and a monthly housing allowance. This review focused on the monthly housing allowance and tuition payments.

Yellow Ribbon Program

The Yellow Ribbon GI Education Enhancement Program (Yellow Ribbon Program) is a provision of the Post-9/11 GI Bill. The program allows an institution of higher learning to voluntarily enter into an agreement with VA to fund tuition expenses that exceed the Post-9/11 GI Bill maximum to help pay for higher out-of-state, private, or graduate school tuition and fees. Institutions can contribute up to 50 percent of those expenses, and VA will match the same amount as the institution. For example, if a university participating in the Yellow Ribbon Program paid 20 percent of a student's tuition, VA would pay another 20 percent, and the student would have 40 percent of their tuition covered.

Institutions may not reduce their matching contribution during the academic year, and they must provide contributions to eligible students on a first-come, first-served basis. These contributions must continue as long as the student maintains satisfactory progress, conduct, and attendance. Institutions' Yellow Ribbon Program agreements must also specify the annual contribution amount per student and the maximum number of students who may receive Yellow Ribbon funding each year.

[3] 38 U.S.C. § 3313.

George Washington University

GWU is a private university in Washington, DC, where students can earn undergraduate and graduate degrees in various programs. As of June 2026, the university reported over 1,100 military-affiliated students, with 43 percent being veterans.[4] In 2019, the university began offering limited enrollment to an accelerated, two-year MBA program. According to school records, 27 students receiving VA education benefits have enrolled in this accelerated program since it began. The first year of the two-year program is considered full time by the university, with a predetermined course schedule; subsequent years allow full- or part-time attendance. The length of courses offered in the program varies from two to eight weeks.

In October 2025, internal GWU documents showed the School of Business began planning to end this accelerated MBA program due to "low enrollment and student satisfaction." Beginning in fall 2027, students will move from the accelerated course model to a seven- or 14-week course model called the flex MBA program, which plans to allow full- or part-time attendance and flexibility to complete the degree in two to five years.[5]

School Certifying Officials

Institutions of higher learning, including GWU, employ officials who are responsible for certifying veteran and beneficiary students' program and course enrollment to VBA. Certifying enrollment is a necessary step so veterans or their beneficiaries accurately receive the VA education benefits they are entitled to. Using VA's enrollment system, certifying officials electronically 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). In addition, certifying officials must maintain and track the annual amount of the school's tuition and fees and Yellow Ribbon Program funding for students in the program.

Education Program Approvals and Oversight

Under 38 U.S.C. § 3672, VA education benefits—including Post-9/11 GI Bill benefits—may be paid only for courses that have been formally approved for GI Bill eligibility, a process carried out primarily by state approving agencies. State approving agencies review, approve, and monitor education and training programs so that the programs meet federal and state requirements. According to VBA's *Education Service Manual*, state approving agencies require any education or training institution to apply for program approval.[6] To receive approval,

[4] "Military & Veteran Services," GWU.

[5] "Flex MBA," GWU.

[6] VBA Manual 22-4, "Liaison and Approval Activities," updated April 30, 2026, pt. 9, chap. 2 in *Education Service Manual*.

institutions must submit certified catalogs accurately describing academic policies—including graduation requirements; grading standards; attendance rules; student conduct policies; and conditions for probation, dismissal, and reentry.[7]

The approved institutions receiving VA education benefit program funds, including Post-9/11 GI Bill funds, must comply with applicable requirements in laws and regulations.[8] VBA's Education Service has various options for assessing compliance and providing oversight, including compliance surveys. These surveys are a detailed review, like an audit, of the education program, meant to help institutions follow all applicable laws and prevent deficiencies and violations, as well as identify and correct them when they are found. They are conducted by VBA education compliance survey specialists or contracted survey specialists. VBA survey specialists also conduct targeted risk-based reviews, which are generated from compliance survey results and potential risk indicators such as complaints, law enforcement actions, lawsuits, or self-reported violations.

[7] VBA Manual 22-4, "Liaison and Approval Activities."

[8] 38 U.S.C. § 3693.

Results

Finding: GWU Veteran and Beneficiary Students Generally Received Accurate VA Education Benefits

During the 2026 academic year (August 1, 2025, through April 30, 2026), the OIG found GWU was generally ensuring veteran and beneficiary students' enrollment certifications to VA were accurate in both the accelerated MBA program and in other programs, which in turn means that students were receiving appropriate VA education benefits, including monthly housing allowance payments. In addition, Yellow Ribbon Program participants generally received the Post-9/11 GI Bill tuition and Yellow Ribbon Program scholarship funding they were entitled to.

While the OIG—as well as the university's school certifying officials—found the students' enrollments were certified correctly, the OIG identified confusion between some veteran students and the university regarding full-time enrollment. This confusion led to the perception that benefits were not being received as they should have been. Although GWU considered the students to be full time, because the graduate program operated in nonstandard terms (shorter or longer than a standard term), the students' rate of pursuit (percentage of course load compared to what the school considers a full-time schedule) varied throughout the terms and did not always entitle students to the maximum housing allowance payment, according to VA's calculation requirements.

During its review, the OIG also found that because of the accelerated program's cost and structure, the students' Post-9/11 GI Bill benefits and Yellow Ribbon funding were not sufficient to cover the full annual cost of the program. Consequently, students had to decide whether to pause their courses for the summer or pay out of pocket. If they paused their courses, they would not have been eligible for any housing allowance during the pause.

Finally, the OIG determined that controls and oversight measures within VBA and GWU were working as designed to detect and mitigate enrollment reporting errors for students using VA education benefits. Because the university generally ensured veteran and beneficiary student enrollments were accurate and VA education benefits were received appropriately, the OIG did not make recommendations based on its review.

The sections that follow provide more details regarding the OIG's review and are organized by each question the subcommittee presented to the OIG. The method the OIG team used to answer each question is provided as appropriate. More details regarding this review's methodology are available in appendix A.

Question 1: Are there any student veterans that are enrolled as full-time students at GWU that are only receiving half of their monthly housing allowance?

The OIG found that no full-time students received "half" of their monthly housing allowance. That said, some student veterans who were considered by the university to be enrolled as full-time students received less than the maximum monthly housing allowance amount. This is because the monthly housing allowance for nonstandard terms is calculated on the basis of several factors, including course length, number of credits, and course schedules. As a result, students who attend graduate or undergraduate programs at GWU may appropriately receive less than the maximum monthly housing allowance amount. These factors are discussed in more detail in appendix B.

From a population of 748 graduate and undergraduate students enrolled at GWU who received Post-9/11 GI Bill education benefits during the 2026 academic year, the OIG selected a random sample of 39 students to review their student records and VA monthly housing allowance payments. The OIG team found that while 32 of the 39 students met GWU's full-time student credit requirement, all 39 received one or more allowances that were below the maximum amount payable for the month. In all instances where the allowance was less than the maximum amount, the OIG found payments were accurate for various reasons, including months being prorated because the student did not attend class for all 30 days; course enrollments for nonstandard terms not yielding a 100 percent rate of pursuit; or benefit-level percentages based on length of active-duty service being below 100 percent.

The OIG team also reviewed the records of all 10 accelerated MBA students enrolled at any time during the 2026 academic year and found that, while these students met GWU's graduate full-time requirement, the conditions of their nonstandard terms did not always qualify them for the maximum monthly housing allowance amount. Institutions typically offer programs in either standard or nonstandard terms.

- In a standard term, classes are offered every quarter (usually about 10 to 13 weeks of instruction) or every semester (about 15 to 19 weeks of instruction). Students enrolled in standard graduate or undergraduate terms who maintain the number of credit hours required by the university to be considered full-time students will receive the monthly housing allowance for the days they are enrolled. Under Title IV rules, undergraduate students in standard academic terms are considered full-time students when they take at least 12 credit hours per term, and a full academic year must include 24 semester credits.
- In a nonstandard term or graduate program, schools must develop their own method—consistent with Department of Education guidelines—to determine what

constitutes a full-time course load. At GWU, a minimum of nine credit hours is required to be considered a full-time graduate student.

When submitting program approvals to be used for VA education benefits, institutions should verify that the program meets minimum standards for grading, attendance, satisfactory performance, and degree completion. These standards help guarantee that students receiving VA education benefits are attending an institution and program that will help them achieve their educational goals. However, the state approval process does not require institutions to create or structure their educational programs so that students are consistently eligible for the maximum monthly housing allowance payment from VA.

While the OIG did not make any recommendations related to the structure of its educational programs, VBA could work with GWU to provide more information to students receiving VA education benefits, especially those enrolled in nonstandard-term programs. This would help accurately and clearly communicate any effects nonstandard terms may have on VA education benefits.

Question 2: Since the program began in 2019, have there been other student veterans who have not received their full monthly housing allowance despite being full-time students? If so, have these students previously flagged the issue for GWU's leadership and was the situation remedied?

Beyond the students identified in the subcommittee's letter, the OIG identified eight accelerated MBA students previously enrolled in the program who properly received some monthly housing allowance entitlements below the maximum amount payable for the month since academic year 2021. Effective August 1, 2021, VBA changed the credit equivalency calculation requirements for nonstandard terms. As a result, for consistency with the calculation requirements for the accelerated MBA students in the complaint, the OIG team reviewed monthly housing allowance payments for accelerated MBA students entitled to monthly housing allowance under the Post-9/11 GI Bill after the August 2021 change. The students' reduced entitlement occurred due to (1) prorated months when the student did not attend class for all 30 days and (2) nonstandard-term course enrollments that did not yield a 100 percent rate of pursuit.

The OIG team also reviewed complaints submitted through the GI Bill Feedback tool and did not identify any related to the accelerated MBA program and the housing allowance since the program began in 2019. The GI Bill Feedback tool is a centralized online reporting system that allows veterans, service members, and eligible dependents to report negative experiences with educational institutions.

To further examine the accelerated program and the associated monthly housing allowance payments, the OIG team reviewed housing allowance payments for the 10 veteran students enrolled in the accelerated MBA program during the 2026 academic year. The team reviewed student records and data from VA systems to determine whether the university accurately certified the students' course term length, credit hours, and adjusted full-time modifier to VA.

In addition to certifying the number of credit hours the student takes that apply to their program, the school also reports the number of credit hours considered full-time for a standard term. For a nonstandard term, the minimum number of credit hours required to be considered full time for a semester, quarter, or any individually defined training period, as published in a school's catalog, is referred to as the full-time modifier. If a school does not publish this modifier for the program or term, then the certifying official must determine the modifier by referencing a published chart in the *School Certifying Official Handbook*. In this situation, the modifier is referred to as the adjusted full-time modifier. In cases where the graduate student is enrolled in a nonstandard term (shorter or longer than a standard term), an adjusted full-time modifier is applied to adjust the credit hours to a full-time equivalent before determining the rate of pursuit. The rate of pursuit is used to determine the percentage of the monthly housing allowance payment that eligible students will receive. This process is discussed in more detail in appendix B.

By spring 2026, only seven of the 10 students were still enrolled in the program. The OIG team determined that while these seven students did not always receive the maximum allowable housing allowance amount, they generally received the allowance amount they were entitled to, based on their courses taken, course length, and number of credits. These students also received information from VA that explained their benefits, including how payments for the monthly housing allowance were calculated. Based on the OIG team's review of these seven students' enrollment certifications, only one was incorrect and resulted in a housing allowance underpayment. This student received a retroactive payment from VA on June 8, 2026.

Institutions are not required to create programs that guarantee veteran and beneficiary students receive the maximum monthly housing allowance rate for the Post-9/11 GI Bill program. They are, however, responsible for certifying the students' dates of enrollment, course credits, and adjusted full-time modifier correctly and in a timely manner to VA, which the OIG team found GWU generally did.

The OIG made no recommendations related to this question because the accelerated MBA students generally received their entitled monthly housing allowance payments accurately, any errors identified were corrected by VBA's review, and there was no evidence of past housing allowance concerns.

Question 3: Is the same issue occurring, or has it occurred, in other accelerated graduate and nongraduate programs offered by GWU? If so, how is or has GWU handling the situation?

The OIG team assessed a random sample of 39 of 748 GWU graduate and undergraduate students, including those in accelerated programs other than the MBA, who received housing allowance payments during the 2026 academic year. Student records and payment data from VA systems were reviewed to determine whether university staff accurately certified the students' course term length, credit hours, and adjusted full-time modifier where applicable and to determine whether the correct monthly housing allowance payments were issued.

For all 39 students, the OIG found credit hours in VA's systems matched those listed in the students' transcripts. That said, the OIG found four of the 39 students (10 percent) did not receive the correct monthly housing allowance payments. All four students experienced at least one monthly housing allowance overpayment during the review period. The sum of all overpayments was about $5,554. One of the four students also experienced at least one monthly housing allowance underpayment during the review period. The sum of all underpayments was $620. VBA staff reviewed and concurred with the errors identified by the OIG team and submitted corrective action referrals to VBA's education regional processing offices or the school certifying officials to correct these errors.

These errors occurred because either the students did not attend courses scheduled on overlapping days or the students experienced extenuating circumstances that required withdrawal from all or part of the course term. These situations resulted in changes to the students' credit hours and rate of pursuit, which in turn affected the amount of monthly housing allowance they were entitled to receive.

Due to the low error rate and corrections, the OIG made no recommendations to address this issue.

Question 4: Why is GWU telling students that they may owe thousands of dollars to complete their program when the school's own advertising shows that the Yellow Ribbon Program at GWU is unlimited? Is this a violation of their Yellow Ribbon Program agreement with VA?

GWU advertises Yellow Ribbon Program scholarships to an unlimited number of students; however, there is a posted academic year maximum dollar amount, depending on what program the student attends. This maximum amount is based on the annual agreement between the university and VA. The total maximum was $64,920.95 for the academic year. If reached, students would be responsible for tuition costs exceeding that amount. In short, while the program was available for an unlimited number of students, funds were not unlimited. The

accelerated MBA students were informed they may have out-of-pocket costs for all or part of their summer-term tuition and fees, estimated at $23,571 per student, due to exhausting the total maximum of both their Post-9/11 GI Bill and Yellow Ribbon scholarship funding amounts.

The university has since informed the accelerated MBA students that summer tuition costs—specifically, mandatory tuition and fees beyond their Yellow Ribbon Program scholarship award—would be covered at no cost to them. This includes the university's agreement to cover any taxes the students may incur resulting from the tuition coverage. Coverage will range from about $12,720 to $20,587 and will be paid from GWU's budget.

The OIG found GWU accelerated MBA students in the Yellow Ribbon Program generally received their Post-9/11 GI Bill tuition and Yellow Ribbon Program scholarship in accordance with GWU's program agreement with VA. The university did not violate its Yellow Ribbon Program agreement with VA because the students were awarded the $35,000 maximum allowable amount in addition to the $29,920.95 Post-9/11 GI Bill tuition maximum for the academic year.

Payments

The OIG team selected a random sample of 37 of 153 students receiving Yellow Ribbon Program scholarships during the 2026 academic year. This number included the seven students enrolled in the accelerated MBA program at that time. Student records and VA payment data were reviewed to determine whether GWU staff certified the correct Yellow Ribbon Program scholarship amount for VA payment and whether payments were accurately applied to student accounts.

While the university did not violate its agreement with VA, the OIG team found that eight of the 37 students (22 percent) did not receive the correct Yellow Ribbon Program payments. Overpayments of Yellow Ribbon Program funds occurred for five of the eight students, totaling about $26,696, with VA's total overpayment being about $22,153. The remaining three of the eight students experienced underpayments of Yellow Ribbon Program funds, totaling about $3,012, with VA's portion being about $2,108. In both overpayments and underpayments that the OIG team found, the school's total and VA's total do not always match because several factors, including certification accuracy and student progress, affect these payments. For example, the school could post their portion of the scholarship to the student's account correctly but certify the amount that VA needs to pay incorrectly. Consequently, VA could end up underpaying even though the school did not. In addition to data entry and certification errors, according to the school certifying officials, the lack of visibility or reporting from VA on the Yellow Ribbon Program disbursements made it difficult to track payments for students.

The OIG team provided these errors to VBA staff, who agreed with the over and underpayments related to VA's portion of the payments. As a result, VBA staff took corrective action for any payments owed to the students, as well as recouped funds owed to VA from GWU. Because the

error rate was low and corrective actions have already been completed, the OIG made no recommendations related to Yellow Ribbon Program payments.

Agreements and Advertising

The team also reviewed the university's Yellow Ribbon Program agreements with VA and information from the university's website related to Post-9/11 GI Bill benefits, monthly housing allowance, and the Yellow Ribbon Program. VBA's chief education liaison officer explained to the OIG team that Yellow Ribbon Program contract terms are typically based on a traditional school year and do not always consider programs with accelerated terms (which usually include a summer term) when the maximum allowable amount is determined. As previously noted, GWU's Yellow Ribbon Program provides additional comprehensive benefits throughout the academic year to an unlimited number of eligible veterans in undergraduate, graduate, and law programs. GWU's website includes the specific amounts it provides for the Yellow Ribbon Program and Post-9/11 GI Bill to cover tuition at private institutions, as illustrated in figure 1.

ACADEMIC YEAR 2025-2026

GI Bill® Cap	GW Contribution + VA Match = YRP		Total Benefit
The GI Bill® cap for all programs for academic year 2025-2026 is:	GW contributes up to an additional:	VA commits to match GW's contribution:	Total benefit (GI Bill® + YRP) for academic year 2025-2026 is up to:
$29,920.95	$26,250 for Undergraduate	$26,250 for Undergraduate	**$82,420.95 for Undergraduate**
	$17,500 for Graduate	$17,500 for Graduate	**$64,920.95 for Graduate**
	$22,750 for Law	$22,750 for Law	**$75,420.95 for Law**

Figure 1. *Screenshot from GWU's website of the maximum financial benefits for veterans.*
Source: "Yellow Ribbon Program," GW Military & Veteran Services, Division for Student Affairs.

Information regarding the tuition maximum is published on GWU's website and is included in the annual Office of Military and Veteran Student Services orientation available to incoming veteran and beneficiary students. This information was provided in multiple sessions either in person or online, and documentation is available on the website. In June 2026, GWU published a notification to students that incoming veteran students must complete a mandatory financial orientation session with the university's Office of Military and Veteran Services before or at the start of their first semester. The university implemented this requirement beginning with the

fall 2026 semester, requiring students to complete the mandatory orientation session by September 30, 2026.

Because GWU's marketing and information materials outline the maximum funding amount per academic year in accordance with its Yellow Ribbon Program agreement with VA, the OIG made no related recommendations.

Question 5: How will GWU student veterans currently enrolled receive back-pay? How will VA and GWU address students that did not receive the full monthly housing allowance they were entitled to in the past?

The OIG found six of the seven GWU students in the accelerated MBA program were not entitled to back pay because, as noted in response to previous questions, they generally received appropriate VA education benefits and housing allowance payments. As noted in the response to question 2, for the one student who was underpaid, retroactive payment was issued on June 8, 2026.

While the accelerated MBA students were certified and generally paid correctly for the spring term of January 12, 2026, through March 1, 2026, the OIG found that in April 2026, in an attempt to address the students' complaints, the associate vice president and deputy dean of students provided a GWU school certifying official with letters of enrollment for each student to "ensure that the students get full housing allowance." Based on this communication and despite knowing that the students did not qualify for a modifier adjustment based on the published adjusted full-time modifier chart, on April 15, 2026, the school certifying official amended the spring enrollment certifications by changing the adjusted full-time modifier.[9] This change generated retroactive housing allowance payments for six of the seven students enrolled. Overpayments to students ranged from about $390 to $1,948, totaling about $9,815 for all six. The remaining student also had an adjusted full-time modifier certification error and was underpaid about $1,594 in monthly housing allowance for the fall term (August 25 through October 18, 2025).

VBA staff also identified these full-time modifier payment errors during the targeted risk-based review initiated by this congressional inquiry and directed the school certifying officials to make the necessary amendments to correct the adjusted full-time modifiers. As a result of the corrections, the six overpaid students were issued a VA debt letter in the amount of their monthly housing allowance overpayments, and the underpaid student received retroactive payment from VA.

[9] Pursuant to the requirements of the Inspector General Act of 1978, the OIG referred the certifying official to the proper authorities at the Department of Justice who declined the matter.

In addition to amending enrollment certifications, GWU leaders issued stipend payments to the students concerned about the accuracy of their allowances. Leaders intended for these payments to cover the difference between the monthly housing allowance the students received from VA and the amount entitled to a full-time student at a 100 percent rate of pursuit.

The first stipend of $2,000 was issued to seven accelerated MBA program students on April 26, 2026, from a fund available for short-term financial assistance to students. However, through further conversations with these students, university staff concluded the first stipend payment did not cover the full housing allowance amount that students believed they were entitled to. Therefore, after reviewing documentation the students provided, the associate vice president and deputy dean of students issued a second stipend payment to the six remaining students on June 3, 2026. These payments ranged from about $893 to $6,934. In total, for all seven accelerated MBA students, GWU issued about $27,886 in stipend payments.

Since the students were not entitled to back pay from VA and GWU took action to compensate students for monthly housing allowance and summer tuition above their VA entitled amounts, the OIG made no recommendations related to this matter.

Question 6: Did GWU account for their recent tuition increase with the Yellow Ribbon Scholarships?

The OIG team reviewed Yellow Ribbon Program agreements and found that GWU increased the annual contribution amount for graduate students annually from $16,800 in 2022 to $17,500 in 2025. Additional information about the university's Yellow Ribbon Program specific to the accelerated MBA students is presented in response to question 5.

Question 7: How does GWU's advertising and marketing for these student veteran programs compare to the actual treatment that student veterans received once they were enrolled?

GWU advertises and markets its educational programs to all prospective and current students; it does not market programs specifically to veteran students. According to 38 U.S.C § 3696, educational institutions are prohibited from using "erroneous, deceptive, or misleading" marketing to recruit veterans. The marketing materials for the university's accelerated MBA program were applicable to all students enrolled and did not contain any specific information for veteran and beneficiary students. Therefore, all students enrolled received the same courses and program structure as advertised.

As of June 2026, the accelerated MBA program was one of five different MBA programs for students displayed on GWU's School of Business website: accelerated MBA, flex MBA, global MBA, online MBA, and online healthcare MBA. The accelerated MBA program was advertised to students as a way to "fast track" their career by "learning in a collaborative cohort

environment" and "completing the core MBA curriculum in an accelerated format with evening courses."[10] Advertisements for the program listed specific benefits, including that students could attend full time or part time, work while studying, combine degree options, and study abroad. Marketing for the program also specified that while students could pursue the degree at their own pace, the first year was full time. Subsequent years could be full time or part time, and the average completion time advertised was two years. Starting August 1, 2026, the accelerated MBA will not be available in the next academic year, and this information was reflected in the university's program catalog and website.

In sum, the OIG team did not find any erroneous, deceptive, or misleading information regarding VA benefits. While the OIG made no recommendations related to this issue, GWU should continue to ensure communication with students receiving VA education benefits is clear and consistent with VA rules and regulations, especially regarding nonstandard-term programs like the accelerated MBA program.

Question 8: What internal controls or oversight mechanisms are in place to prevent errors or delays in VA reporting at GWU?

Several controls exist within VBA and GWU to prevent errors or delays in reporting enrollment certification to VA. VBA's oversight mechanisms identify and correct any errors that may occur. In addition, approving agencies review and approve programs before VA can disburse educational assistance to eligible students. These controls help limit the risk of VA education benefits fraud, waste, or abuse affecting taxpayer dollars.

VBA

VBA uses compliance surveys and targeted risk-based reviews to oversee the university's compliance with all applicable laws; prevent deficiencies and violations; and investigate complaints, law enforcement actions, lawsuits, or self-reported violations. Overall, the OIG found VBA's controls are working as designed to identify enrollment certification reporting errors and provide corrective actions, more training, or direction to the school certifying officials responsible for handling VA benefit education enrollments when necessary.

VBA conducted a compliance survey of GWU in April 2025, citing clerical errors for Yellow Ribbon Program certification amounts, but these errors did not result in overall inaccurate payment amounts by VA. However, the compliance survey recommended that GWU school certifying officials receive more training by VA's education liaison representative on Yellow Ribbon Program certifications. A school certifying official who received the training told the OIG team no new or unknown information was provided in the training. This official also said the lack of visibility or reporting from VA on the Yellow Ribbon Program disbursements

[10] "Accelerated MBA," GWU School of Business.

increased the difficulty in tracking these payments. A VBA chief education liaison officer confirmed that the report schools received listing Yellow Ribbon Program payments by veterans and the corresponding academic term was "sunsetted" in 2024 with the deployment of the Digital GI Bill. According to the liaison officer, Yellow Ribbon Program errors occur because this information cannot be easily matched; however, there is a planned initiative to address this issue with a programming rule in the Digital GI Bill to mitigate these errors.

The compliance survey conducted for GWU in April 2025 did not identify concerns with the adjusted full-time modifier determination, nor were the accelerated MBA students selected for review during that survey. VBA uses a random selection process and the number of accelerated MBA students receiving VA education benefits is small compared to the overall veteran student population, which is why they may not have been randomly selected. Nevertheless, a VBA chief education liaison officer told the OIG team that she recommended refresher training on the adjusted full-time modifier for VBA and contracted compliance survey specialists to ensure errors are identified and certifying officials receive more training when needed.

As previously noted, when VBA was made aware of the congressional subcommittee's concerns brought forth in early May 2026, it conducted a targeted risk-based review during the week of May 18, 2026. Required by VBA's *Education Service Manual*, these reviews are generated from compliance survey results and potential risk indicators such as complaints, law enforcement actions, lawsuits, or self-reported violations. This targeted review focused on nonstandard-term students and Yellow Ribbon Program payments. It cited systemic inaccuracies in determining the adjusted full-time modifier for nonstandard graduate terms and found Yellow Ribbon certification errors like those noted in the 2025 compliance survey. A VBA chief education liaison officer also stated that while GWU could certify accelerated MBA students under the standard MBA program according to 38 U.S.C § 3672, the state approving agency should review and approve the accelerated program and any other nonstandard-term program individually. This is because the accelerated program relied on nonstandard terms and presented different program costs and course lengths than the standard program.

Since the 2026 summer-term enrollments had not been certified at the time of VBA's review, in mid-June 2026, VBA staff checked the accelerated MBA students' summer enrollment certifications. VBA found that the school certifying official incorrectly used an adjusted full-time modifier when certifying the summer enrollments. Because GWU has an individually defined modifier for summer terms published in the school catalog, this modifier should be used instead of an adjusted full-time modifier when certifying the nonstandard summer-term enrollments.

Since this processing error affected only students enrolled in the summer term, VBA instructed GWU to review all graduate or nonstandard-term students enrolled in the 2026 summer term and submit amended enrollments using only the published individually defined modifier. VBA reported the enrollments were amended on July 21, 2026, generating a debt to the students for the overpaid housing allowances for May and June. VBA identified 64 veteran students who

received these overpayments ranging from about $16 to $4,133 per student, totaling about $65,588. GWU contacted the affected students and instructed them to provide the university with their VA debt letters, so GWU can issue repayment of the debt to VA on their behalf.

GWU

GWU school certifying officials use spreadsheets to manually keep track of enrollment and certification for students receiving VA education benefits. Based on minimal or nonmaterial errors the OIG identified, this tracking process seems to be generally working as designed to ensure VA certifications are being processed as required.

These spreadsheets require manual entry from various systems within the university and VA's enrollment system to maintain a list of GWU students receiving VA education benefits. The spreadsheets are used to track students' enrollment and certification activity and contain formulas to automate calculations and conditional formatting to help identify errors or anomalies. School certifying officials and the director conduct weekly and monthly reviews of the spreadsheets to ensure certifications are completed and any VA funds received are posted to student accounts.

While GWU student accounts do not have a running balance specific to their Post-9/11 GI Bill and Yellow Ribbon Program funds used, all students can see their courses and associated tuition and fees, balances due, and payments posted. As mentioned above, GWU school certifying officials cited challenges due to lack of visibility or reporting from VA on the Yellow Ribbon Program payments. VBA also acknowledged these challenges. But, according to a VBA chief education liaison officer, until VA finds a fix for the Yellow Ribbon Program certification and fund notification process, the education compliance survey specialist and liaison representatives do not have any additional corrective suggestions to offer. Thus, the OIG concluded that a mechanism to track the Yellow Ribbon Program at the university would be helpful.

According to GWU's school certifying officials, as of August 2025, more Yellow Ribbon Program scholarship tracking was added to the certification spreadsheet. This addition will track Yellow Ribbon Program balances for students and alert them if they are near the maximum allowable amount for the academic year. Overall, GWU's controls help identify inconsistencies in student enrollment, monthly housing allowance payments, and Yellow Ribbon Program tuition allocations.

State Approving Agency

A school or program must be approved by the state approving agency before VA can disburse educational assistance to eligible students. However, the OIG determined that GWU did not obtain separate approval from the Washington, DC, state approving agency for the accelerated MBA program. Instead, a VBA chief education liaison officer explained that the university certified enrollments for the accelerated MBA students under the "umbrella" of the MBA

approval. While this is permitted under the provision of 38 U.S.C § 3672 because it is an approved institution of higher learning, the state approving agency could have asked the university to obtain separate approval due to the difference in program attendance, cost, equipment, length, or objective. The Washington DC's state approving agency's unsatisfactory performance resulted in VBA taking over the responsibilities for approval and oversight activities for DC's educational institutions for fiscal year 2027. VBA notified the agency of this decision in September 2026.

According to GWU staff, there was no policy or standard operating procedure requiring the individual schools within the university to consult with the school certifying officials when creating or changing a degree program. During interviews with the OIG team, university staff agreed that it would be beneficial to have a standard practice or requirement for each school to inform the school certifying officials within the Office of Military and Veteran Student Services of new or modified programs. This practice could help assess new programs for approval requirements and identify potential impacts that course credits and dates may have on VA education benefits.

Because both VBA's and GWU's controls are functioning as intended to identify and correct issues, the OIG made no recommendations in this area. Oversight activities have already resulted in corrective actions where needed, and no additional action was needed at the time of this review.

Conclusion

Veteran students in GWU's accelerated MBA program generally received appropriate monthly housing allowances during the 2026 academic year. They also accurately received Yellow Ribbon Program scholarships. Beyond the accelerated program, the university is generally ensuring veteran and beneficiary students' enrollments are accurate and benefits are received appropriately.

Students in the accelerated MBA program were under the impression that they were enrolled full time because of how the university defined their enrollment and, understandably, assumed they were eligible for the maximum monthly housing allowance benefit. However, course credits and dates did not meet VA's nonstandard-term requirements for full-time enrollment. While the accelerated MBA program is transitioning into a new program in the future, the results of this review can inform how the university communicates nonstandard program terms to students receiving VA education benefits.

Moving forward, it is important that GWU consults with its Office of Military and Veteran Student Services when developing new programs so that veteran students understand the impact course credits and dates may have on VA education benefits. Doing so will help mitigate unexpected education costs. GWU should also consider securing separate approval from VBA or the state approving agency for accelerated programs, especially if there is a difference between

the accelerated and standard programs' attendance, cost, equipment, length, or objectives. These steps will help limit the risk of VA education benefits fraud, waste, or abuse affecting taxpayer dollars.

VA Management Comments

In October 2026, the principal deputy under secretary for benefits, performing the delegable duties of the under secretary, appreciated and concurred with the OIG's review findings. VBA is working to reduce certification and payment errors associated with graduate nonstandard terms and Yellow Ribbon benefits through planned functionality under a Digital GI Bill initiative. This initiative will integrate the graduate nonstandard-term process, enabling automatic calculation of the associated rate of pursuit and reducing manual calculation errors. Yellow Ribbon payment functionality is under development to improve the accuracy, consistency, and automation of the certification and payment process to reduce school certifying official tracking. The full comments are included in appendix C.

OIG Response

VBA's comments are responsive to the intent of the OIG's review. The OIG is not making recommendations for additional actions based on this review but will monitor VBA's planned Digital GI Bill initiatives related to nonstandard terms and Yellow Ribbon Program certifications.

Appendix A: Scope and Methodology

Scope

The VA Office of Inspector General (OIG) team conducted its work from May 2026 through September 2026. The scope of the team's review included George Washington University (GWU) students receiving Post-9/11 GI Bill benefits and Yellow Ribbon Program scholarships from August 1, 2025, through April 30, 2026 (academic year 2026).

Methodology

To accomplish the review objective, the team identified and reviewed statutes, regulations, policies, procedures, and guidelines related to monthly housing allowances and Yellow Ribbon Program scholarships. The review team used computer-processed data derived from VA's Long Term Solution; Digital GI Bill; and Enterprise Management of Payments, Workload, and Reporting. In addition, the team used GWU's student account records, including payment ledgers, transcripts, and enrollment information. Using this data, the team selected a sample of 40 graduate and nongraduate students, one of whom was an accelerated Master of Business Administration (MBA) student receiving monthly housing allowance payments, and a sample of 37 students who received Yellow Ribbon Program scholarships. In addition, the team reviewed nine accelerated MBA students receiving monthly housing allowance payments, and seven accelerated MBA students who received Yellow Ribbon Program scholarships. Student records were compared with VA payment data to determine whether students' enrollment certifications, monthly housing allowance payments, and Yellow Ribbon Program scholarship disbursements were accurate.

The review team conducted a site visit at GWU and interviewed school certifying officials, the vice president of student affairs and dean of students, associate vice president of student affairs and deputy dean of students, director of Master of Business Administration (MBA) Programs for the School of Business, university registrar, senior financial and tax reporting analyst, and 12 students receiving VA education benefits. In addition, the OIG team interviewed Veterans Benefits Administration staff, including the chief education liaison officer, education liaison representative, and education compliance survey specialist who conducted the targeted risk-based review and compliance survey.

Internal Controls

The team assessed internal controls to determine whether they were significant to the review objective. This included consideration of the five internal control components: control environment, risk assessment, control activities, information and communication, and

monitoring.[11] The team did not find any significant internal control deficiencies during this review.

Data Reliability

As part of the review, the team assessed the reliability of the data extracted from Long Term Solution; Digital GI Bill; and Enterprise Management of Payments, Workload, and Reporting—VBA's primary systems of record for education benefits and payments. The team's objective was not to test any system controls but to assess whether the data were sufficiently reliable to support findings and conclusions related to the accuracy of monthly housing allowance and Yellow Ribbon Program payments. Data reliability testing determined that the reliability and validity of the data met the objective of the review. The data appear to be complete and do not contain any obvious errors, missing information, or items outside the project scope.

Government Standards

The OIG conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.[12]

Use of Artificial Intelligence (AI)

The review team used Microsoft Copilot during the review to summarize interviews, suggest wording, and revise text for clarity and plain language. The team's analysis and findings are based on professional judgment, consistent with VA OIG policy and applicable professional standards. All AI-generated output was reviewed and verified by the team, which maintains full responsibility for the content of this report. All citations in this report refer to original source material, not the team's AI-generated content.

AI assistance was not used as the principal basis for any conclusions or decisions and, therefore, does not meet the definition of "high-impact" AI under the Office of Management and Budget's Memorandum M-25-21.[13]

[11] Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-25-107721, May 2025.

[12] Council of the Inspectors General on Integrity and Efficiency, *Quality Standards for Inspection and Evaluation*, December 2020.

[13] Office of Management and Budget Memorandum M-25-21, *Accelerating Federal Use of AI through Innovation, Governance, and Public Trust*, April 3, 2025, sec. 4a.

Appendix B: Post-9/11 GI Bill Monthly Housing Allowance Calculation

The Post-9/11 Veterans Educational Assistance Act of 2008 (Post-9/11 GI Bill) monthly housing allowance is calculated based on the amount of certified credits (the number of credit hours the university requires for the student to be considered full time) and the student's rate of pursuit (percentage of course load compared to what the school considers a full-time schedule). In instances where the course schedule is shorter or longer than a standard term—in other words, nonstandard—a modifier is applied to determine the course's equivalent full-time credit hours and the student's rate of pursuit. The rate of pursuit determines the percentage for the monthly housing allowance payment calculation.

Rate of Pursuit Calculation

Calculating the rate of pursuit involves several steps. According to VA's *School Certifying Official Handbook*, when certifying graduate student enrollments, school certifying officials are required to report a modifier, which is used to adjust credits taken to a full-time-equivalent level for the period certified.[14] In nonstandard terms that do not have a published individually defined modifier, school certifying officials must use an adjusted full-time modifier. The adjusted full-time modifier is determined by referencing a published chart in the *School Certifying Official Handbook*. For George Washington University (GWU), the graduate student requirement for full time is nine credit hours. Once the university submits the enrollment to VA, VA determines the student's rate of pursuit by dividing the number of credits the student is enrolled in by the certified adjusted full-time modifier. The rate of pursuit percentage then determines the monthly housing allowance percentage the student is entitled to for that period. Every time a course ends or a new one begins, the student's rate of pursuit is recalculated based on the course(s) they are attending at that time.

If a student's rate of pursuit is 51 percent or more, a Post-9/11 GI Bill monthly housing allowance based on the student's rate of pursuit is paid directly to the student by VA.[15] This could be the maximum monthly housing allowance amount or, in some cases, it may be a reduced allowance. If the rate of pursuit is less than 51 percent, the student does not qualify for an allowance at all. The housing allowance is prorated by the student's eligibility benefit level and 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

[14] VA School Certifying Official Handbook (On-line), "Certifying Credit."

[15] VA School Certifying Official Handbook (On-line), "Rate of Pursuit and Training Time."

for the student's area of residence. That rate is then multiplied by days of instruction or training to determine the total monthly housing allowance payment.

Nonstandard Terms and Adjusted Full-Time Modifier

GWU's accelerated Master of Business (MBA) program is conducted in a nonstandard-term format consisting of program courses ranging from two to eight weeks, with one-and-a-half to three credit hours per course. The program's course structure resulted in each course receiving its own adjusted full-time modifier. As a result, the rate of pursuit fluctuated throughout the semester. The following example illustrates these fluctuations.

Example

GWU's 2025 fall semester ran from August 25 through December 18, 2025. The school certifying official certified the accelerated MBA student for the following dates:

- *Course A: August 25 through September 27, 2025 (3 credits)*
- *Course B: August 25 through October 12, 2025 (1.5 credits)*
- *Course C: October 1 through November 1, 2025 (3 credits)*
- *Course D: October 20 through December 13, 2025 (3 credits)*

Using the required chart published in the School Certifying Official Handbook *and the university's requirement of nine graduate credits, the adjusted full-time modifier for these courses was determined as follows:*

- *Course A: Five weeks, adjusted full-time modifier of 2*
- *Course B: Seven weeks, adjusted full-time modifier of 3*
- *Course C: Four weeks, adjusted full-time modifier of 2*
- *Course D: Eight weeks, adjusted full-time modifier of 4*

Using this adjusted full-time modifier, the rate of pursuit was determined by dividing the number of credits by the adjusted full-time modifier as follows:

- *Course A: 150 percent rate of pursuit (3 credits/2 modifier)*
- *Course B: 50 percent rate of pursuit (1.5 credits/3 modifier)*
- *Course C: 150 percent rate of pursuit (3 credits/2 modifier)*
- *Course D: 80 percent rate of pursuit (3 credits/4 modifier)*

The rate of pursuit shown in the example was recalculated five times from August 25 to December 13, 2025, to align with course start and stop dates. Figure B.1 depicts how the students' rate of pursuit from example 1 fluctuated throughout the semester, thereby affecting their monthly housing allowance entitlement percentage.

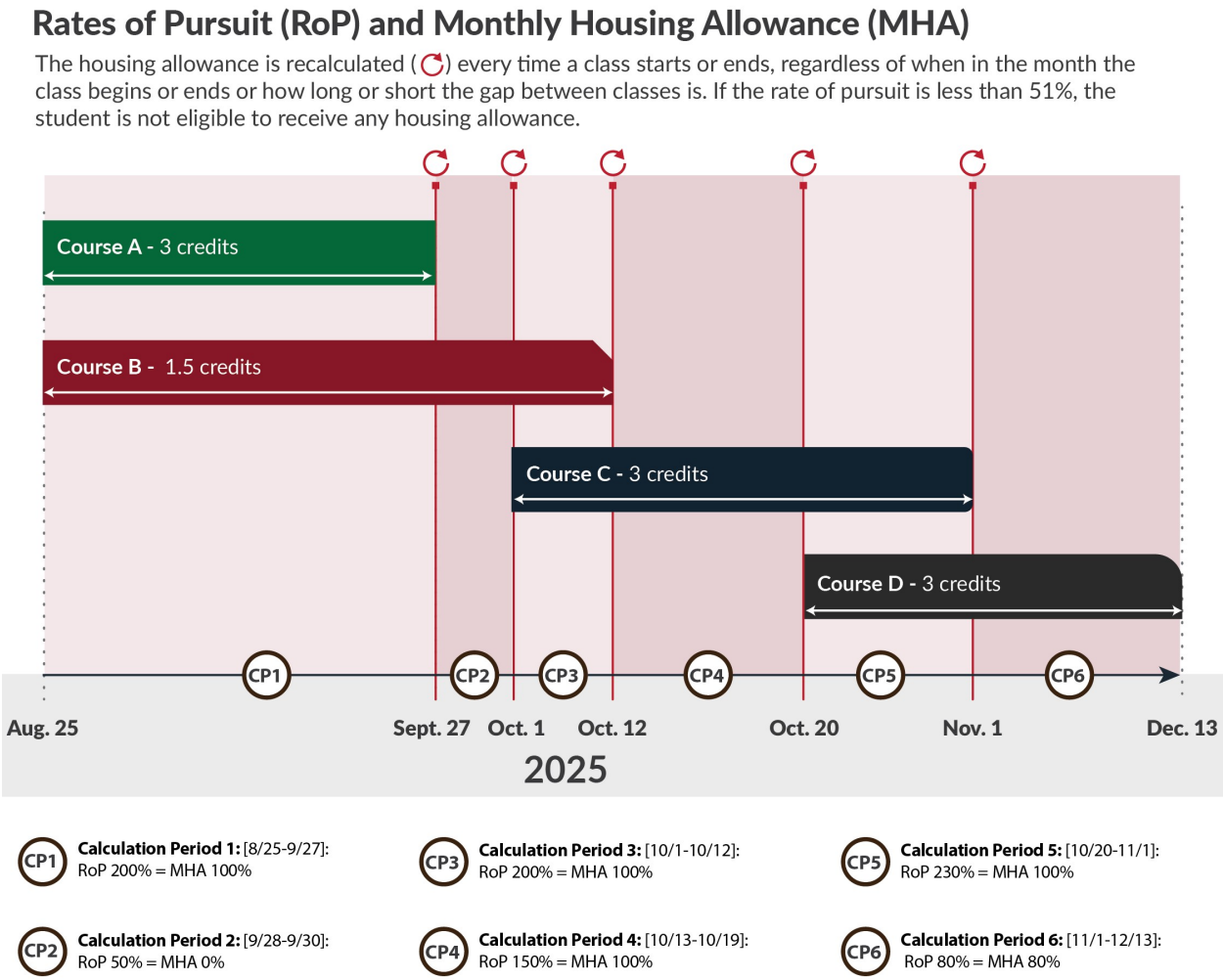


Figure B.1. *Rates of pursuit and monthly housing allowance based on an actual GWU nonstandard term for a student's fall 2025 semester.*

Source: VA OIG interpretation of student VA and GWU enrollment records from August through December 2025.

The rate of pursuit percentage is applied to the daily rate and multiplied by the number of days the student is enrolled for the month. Using the example rates of pursuit provided in figure B.1, if an accelerated MBA student's monthly rate was $3,075, the daily rate (divided by 30 days) would be $102.50. For the September 2025 housing allowance payment, this student may have received the full daily rate for 27 days (September 1–27) with a rate of pursuit of 100 percent and

three days of no housing allowance (September 28–30) because the rate of pursuit was below 51 percent. This would result in a total September monthly housing allowance payment of $2,767.50.

Appendix C: VA Management Comments

Department of Veterans Affairs Memorandum

Date: October 6, 2026

From: Under Secretary for Benefits (20)

Subj: Office of Inspector General Draft Report: Review of Veteran Students' Post–9/11 GI Bill Education Benefits at George Washington University (Project No. 2026-02655-AE-0065)

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

1. Thank you for the opportunity to review and comment on the Office of Inspector General (OIG) draft report: Review of Veteran Students' Post–9/11 GI Bill Education Benefits at George Washington University. The Veterans Benefits Administration (VBA) provides the attached response to the draft report.

The OIG removed point of contact information prior to publication.

(Original signed by)

J. Margarita Devlin

Principal Deputy Under Secretary for Benefits

Performing the Delegable Duties of the Under Secretary for Benefits

Attachment

Attachment

Veterans Benefits Administration (VBA)

Comments on Office of Inspector General (OIG) Draft Report

Review of Veteran Students' Post-9/11 GI Bill Education Benefits at George Washington University

(Project No. 2026-02655-AE-0065)

VBA concurs with the OIG's draft report findings and provides the following comments:

VBA appreciates OIG's findings in the draft report, which corroborate the findings from VBA's targeted risk-based survey performed in May 2026. VBA and OIG agree that George Washington University's certifications for the accelerated Master of Business Administration program, and the resulting payments, were generally accurate and that student concerns regarding monthly GI Bill payments generally stemmed from students' confusion and poor school communication regarding the differences between being a full-time student for university enrollment purposes and being full time for GI Bill benefit purposes.

VBA is working to reduce certification and payment errors associated with graduate nonstandard terms and Yellow Ribbon benefits. Planned functionality under the Digital GI Bill (DGIB) initiative includes integration between the Enrollment Manager system school certifying officials (SCOs) use to submit enrollments, the Approval Manager system state approving agencies and VA will use to approve programs of education, and the adjudication systems VA uses to process enrollment submissions. DGIB will integrate the graduate nonstandard term process, enabling automatic calculation of the associated rate of pursuit, and reducing errors caused by manual calculations and data entry. In addition, VBA is developing Yellow Ribbon payment functionality to improve the accuracy, consistency, and automation of the certification and payment process, reducing the need for SCOs to track GI Bill payments against applicable tuition and fee caps and the student dollar amount maximums specified in the Yellow Ribbon agreement.

The text of VA's management comments is reprinted verbatim as received from the department. For accessibility, the original format of this appendix has been modified to comply with section 508 of the Rehabilitation Act of 1973, as amended.

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Pursuant to Pub. L. No. 117-263 § 5274, codified at 5 U.S.C. § 405(g)(6), nongovernmental organizations, and business entities identified in this report have the opportunity to submit a written response for the purpose of clarifying or providing additional context to any specific reference to the organization or entity. Comments received consistent with the statute will be posted on the summary page for this report on the VA OIG website.

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