

## Meeting Summary Report

<b>cMeeting Name</b>	<b>VA Joint Symposium: Safeguarding the Integrity of GI Bill® Benefits</b>
<b>Meeting Date</b>	August 3, 2016
<b>Meeting Time</b>	8:00 a.m. to 12:00 p.m.
<b>Meeting Location</b>	Veterans Benefits Administration, 1800 G Street NW (Room 542)
<b>Facilitator</b>	Mr. Curtis L. Coy, Deputy Under Secretary for Economic Opportunity
<b>Purpose</b>	Create a more robust dialogue and understanding, and develop improved strategic partnerships with organizations that have criticized our response to bad actors in higher education. Enlist these organizations' help to develop actionable solutions to protect the integrity of the GI Bill.

### Background:

With the complexities of the Post-9/11 GI Bill and the changing higher educational environment, VA has expanded its role from an administrator of benefits to creator of the well-informed consumer, and is now pivoting to enhancing its role in enforcement through more aggressively exercising its authorities to protect Veterans from dishonest schools.

VA called this symposium to discuss possible answers to these questions:

- How far should VA go in creating informed consumers? Can we be more proactive in quality and quantity of our communications?
- How far should VA go in asserting its enforcement authorities independent of State authorities?
- How do we best balance protecting our beneficiaries through enforcement actions with potentially derailing their educational pursuits/progress? (i.e. withdrawing GI Bill approval from DeVry and impacting 15,000 GI Bill beneficiaries at over 70 campuses in over 20 states)?
- What should be the standards of evidentiary basis on which VA would take various forms of enforcement action (POE removal, suspension, withdrawal), either unilaterally or through a request to a State Approving Agency? (i.e. Dept. of ED findings/action; Complaint voted out by the Federal Trade Commission)?

### Summary:

- This symposium served to further open the communication lines between government and service organizations, and to enhance the dialogue as to how to best protect the interests of our Veteran students.
- Discussion centered on VA enforcement mechanics and potential triggers; VA compliance with title 38 UCS; and how to assist student veterans at ACICS-accredited schools. While some participants felt shutting down schools for deceptive marketing and misleading students would prevent such in the future, others felt great care must be taken in considering the impacts of such actions

## Meeting Summary Report

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on current enrollees who would suddenly have to change the course of their academic pursuits.

- Going forward, we will examine the enforcement tools we currently have and keep the communication lines open among all parties to enable student Veterans to make the best choices possible for their educational pursuits.

### Action Items:

1. VA General Counsel, Federal Trade Commission (FTC) and other federal agencies examine the range of interim steps VA may be able to take during the process of an FTC (or other federal agency) investigation. (assigned to FTC, VA OGC, VA OEO)
2. Full Sail/RICO: DOJ and VVA will coordinate enforcement efforts. (assigned to DOJ, VVA)
3. Review VA/FTC Memorandum of Understanding (MOU) to better clarify information sharing process and standards of evidence. (assigned to FTC)
4. VA to establish a schedule to write new regulations covering GI Bill oversight, or find other non-regulatory methods to codify VA's enforcement triggers and approach. (assigned to VA OEO)
5. Expand the continuum chart to look at all sources of complaints and possible actions. (assigned to FTC, ED, VA OEO)
6. Work with partners at Department of Education on ACICS accrediting revocation fallout and teach out plan; keep Department of Defense updated. (assigned to ED, VA OEO)
7. Consider increased authority for SAAs to do risk-based reviews and increasing financial resources (\$19 million budgetary request) (assigned to NASAA, VA OEO)
8. Develop opportunities to counsel students (current and potential) with assistance from VSOs/NGOs; establish Points of Contact at these organizations (assigned to Student Veterans of America)

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## Meeting Summary Report

### Attachment: Meeting Attendees

Organization	Name	Title	Email
American Legion	John Kamin	Assistant Director of Veterans Employment & Education	<a href="mailto:JKamin@legion.org">JKamin@legion.org</a>
Blue Star Families	Amy Bontrager	Blue Star Careers Program Manager	<a href="mailto:abontrager@bluestarfam.org">abontrager@bluestarfam.org</a>
Iraq & Afghanistan Veterans of America	Thomas Porter	Legislative Director	<a href="mailto:thomas@iava.org">thomas@iava.org</a>
Military Child Education Coalition	David Lapan	Senior Director	<a href="mailto:david.lapan@militarychild.org">david.lapan@militarychild.org</a>
Military Officers Association of America	Aniela Szymanski	Deputy Director of Government Relations	<a href="mailto:anielas@moaa.org">anielas@moaa.org</a>
Military Order of the Purple Heart	Aleks Morosky	Deputy Legislative Director,	Not provided
National Association of Black Veterans	Joe Wynn	National Legislative Liaison	<a href="mailto:joewynn@vetsgroup.org">joewynn@vetsgroup.org</a>
National Association of State Approving Agencies	Joe Wescott	Legislative Director	<a href="mailto:jww@northcarolina.edu">jww@northcarolina.edu</a>
Paralyzed Veterans of America	Gabe Stultz	Associate Legislative Director	<a href="mailto:GabrielS@pva.org">GabrielS@pva.org</a>
Student Veterans of America	Derek Fronabarger	Director of Policy	<a href="mailto:derek.fronabarger@studentveterans.org">derek.fronabarger@studentveterans.org</a>
Student Veterans of America	James Schmeling	Executive Vice President, Strategic Engagement for Student Veterans of America	<a href="mailto:james.schmeling@studentveterans.org">james.schmeling@studentveterans.org</a>
The Retired Enlisted Association	Michael Saunders	Deputy Legislative Director	<a href="mailto:msaunders@treadc.org">msaunders@treadc.org</a>
Tragedy Assistance Program for Survivors	Kathy Moakler	Director, External Relations and Policy Analysis	Not provided
Veterans' Advisory Committee on Education	Dr. Kathy Snead	Chair	<a href="mailto:SneadK@aascu.org">SneadK@aascu.org</a>
Veterans Education Success	Carrie Wofford, Esq.	President	<a href="mailto:carrie.wofford@veteranseducationuccess.org">carrie.wofford@veteranseducationuccess.org</a>
Veterans Legal Clinic, University of San Diego	Robert Muth	Managing Attorney, University of San Diego School of Law Veterans Legal Clinic	<a href="mailto:rmuth@SanDiego.edu">rmuth@SanDiego.edu</a>

## Meeting Summary Report

Veterans of Foreign Wars	Ryan Gallucci	Deputy Director, National Legislative Service	<a href="mailto:RGallucci@vfw.org">RGallucci@vfw.org</a>
VetsFirst, a program of United Spinal Association	Ross Meglathery	Director	<a href="mailto:rmeglathery@vetsfirst.org">rmeglathery@vetsfirst.org</a>
Vietnam Veterans of America	Kristofer Goldsmith	Assistant Director for Policy and Government Relation	Not provided
Vietnam Veterans of America	Rick Weidman	Executive Director for Policy & Government Affairs	<a href="mailto:rweidman@vva.org">rweidman@vva.org</a>
Consumer Financial Protection Bureau	Holly Petraeus	Assistant Director, Office of Servicemember Affairs	<a href="mailto:hollister.petraeus@cfpb.gov">hollister.petraeus@cfpb.gov</a>
Department of Defense	Dawn Bilodeau	Chief, DoD Voluntary Education	<a href="mailto:dawn.a.bilodeau.civ@mail.mil">dawn.a.bilodeau.civ@mail.mil</a>
Department of Defense	Lt. Col. Jacqueline Stingl	Office of General Counsel	Not provided
Department of Education	Robert Kaye	Chief Enforcement Officer; Federal Student Aid	<a href="mailto:Robert.Kaye@ed.gov">Robert.Kaye@ed.gov</a>
Department of Justice	Silas Darden	Director of the Servicemembers and Veterans Initiative	<a href="mailto:Silas.darden@usdoj.gov">Silas.darden@usdoj.gov</a>
Department of Justice	William Edgars	Counsel to the Assistant Attorney General	<a href="mailto:william.edgars@usdoj.gov">william.edgars@usdoj.gov</a>
Federal Trade Commission	Sandhya Brown	Assistant Director; Division of Financial Practices	<a href="mailto:SBrown5@ftc.gov">SBrown5@ftc.gov</a>
VA	Robert Snyder	Chief of Staff	<a href="mailto:Robert.Snyder@va.gov">Robert.Snyder@va.gov</a>
VA; Office of General Counsel	Leigh Bradley	General Counsel	<a href="mailto:leigh.bradley@va.gov">leigh.bradley@va.gov</a>
VA; Veterans Benefits Administration	Thomas J. Murphy	Principal Deputy Under Secretary for Benefits Performing the duties of Under Secretary for Benefits	<a href="mailto:Thomas.J.Murphy@va.gov">Thomas.J.Murphy@va.gov</a>
VA; Office of Economic Opportunity	Curtis L. Coy	Deputy Under Secretary for Economic Opportunity	<a href="mailto:curtis.coy@va.gov">curtis.coy@va.gov</a>
VA; Education Service	Robert M. Worley II	Director	<a href="mailto:robert.worley@va.gov">robert.worley@va.gov</a>
VA	Mark Erwin	VSO Liaison	<a href="mailto:mark.erwin@va.gov">mark.erwin@va.gov</a>

## Meeting Summary Report

Office of General Counsel	Bryan Thompson	Not Provided	<a href="mailto:bryan.thompson2@va.gov">bryan.thompson2@va.gov</a>
Executive Office of the President	Ajita Menon	Not Provided	Not provided
Executive Office of the President	Lauren Starks	Not Provided	Not provided
Executive Office of the President	David Vorhaus	Not Provided	Not provided
VA; Office of Economic Opportunity	Betty Rhoades	Executive Management Officer	<a href="mailto:Betty.Rhoades@va.gov">Betty.Rhoades@va.gov</a>
VA; Education Service	Tom Alphonso	Team Leader	<a href="mailto:thomas.alphonso@va.gov">thomas.alphonso@va.gov</a>
VA; Education Service	Cheryl Amitay	Compliance & Liaison Team Leader	<a href="mailto:cheryl.amitay@va.gov">cheryl.amitay@va.gov</a>
VA; Education Service	Allison Barton	Management Analyst	<a href="mailto:allison.barton@va.gov">allison.barton@va.gov</a>
VA; Education Service	Barrett Bogue	Team Leader	<a href="mailto:barrett.bogue@va.gov">barrett.bogue@va.gov</a>
VA; Education Service	Jeff Harbeson	Deputy Director	<a href="mailto:jeff.harbeson@va.gov">jeff.harbeson@va.gov</a>
VA; Education Service	Tammy Hurley	Management Analyst	<a href="mailto:tammy.hurley1@va.gov">tammy.hurley1@va.gov</a>
VA; Education Service	Mike Hyams	Acting Assistant Director	<a href="mailto:michael.hyams@va.gov">michael.hyams@va.gov</a>
VA; Education Service	Randall Lazaro	Management Analyst	<a href="mailto:randall.lazaro@va.gov">randall.lazaro@va.gov</a>
VA; Education Service	Ann Richardson	Management Analyst	<a href="mailto:ann.richardson@va.gov">ann.richardson@va.gov</a>
VA; Education Service	James Ruhlman	Assistant Director	<a href="mailto:james.ruhlman@va.gov">james.ruhlman@va.gov</a>

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of Veterans Affairs