

GAO

Report to the Ranking Member,
Subcommittee on Economic
Opportunity, Committee on Veterans'
Affairs, House of Representatives

June 2008

HIGHER EDUCATION

Veteran Students Received Similar Amounts of Title IV Aid As Nonveterans but More Total Aid with GI Benefits



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Abbreviations

COA	cost of attendance
DOD	Department of Defense
EFA	estimated financial assistance
EFC	expected family contribution
FSEOG	Federal Supplemental Educational Opportunity Grants
FWS	Federal Work-Study
VA	Department of Veterans Affairs

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United States Government Accountability Office
Washington, DC 20548

June 20, 2008

The Honorable John Boozman
Ranking Member
Subcommittee on Economic Opportunity
Committee on Veterans' Affairs
House of Representatives

Dear Mr. Boozman:

Over the past decade, average college tuition and fees increased between 20 and 38 percent, depending on the type of institution. This rising cost of college affects all students—both veteran and nonveteran students—who rely on a mix of family resources, grants, scholarships, loans, and work-study to finance their education. Students may face particular hardships when the cost of attendance outpaces students' available resources. For example, some lenders recently have tightened the eligibility criteria for obtaining student loans in response to problems in financial markets. In fiscal year 2007, the Department of Education (Education) provided \$82 billion in financial aid in the form of grants, loans, and work-study programs under Title IV of the Higher Education Act of 1965, as amended, to 11 million students and their families. The primary Title IV aid programs include Pell Grants, Stafford Loans, and campus-based aid programs. Veterans also may be eligible for federal financial aid from the Department of Veterans Affairs (VA). VA awarded about \$2 billion in Chapter 30 education benefits under the Montgomery GI Bill¹ (Chapter 30 GI benefits) to more than 300,000 veteran students in fiscal year 2007.

In 2002, we reported that veteran students were awarded similar amounts of Title IV aid as nonveteran students, and veterans' total federal aid was greater when Chapter 30 GI benefits were included.² You asked about whether this has changed, resulting in veterans receiving less federal financial aid. To address this question, you asked us to determine (1) how the amount of Title IV financial aid awarded to veteran students compares with that awarded to nonveteran students, (2) how higher education institutions allocate Title IV financial aid among veteran and nonveteran

¹Montgomery GI Bill at 38 U.S.C. Chapter 30.

²GAO, *Veterans' Education Benefits: Comparison of Federal Assistance Awarded to Veteran and Nonveteran Students*, GAO-02-368 (Washington, D.C.: Feb. 28, 2002).

students, and (3) how federal agencies and higher education institutions provide information to veterans on Title IV financial aid.

To address our first objective, we compared veteran students to nonveteran, independent students. Our scope includes both veterans and active-duty personnel who served for 3 or more years and received Chapter 30 GI benefits.³ We used the most recent data available from Education to compare amounts of Title IV aid awarded to veteran and nonveteran students in their first year of full-time study. We assessed the reliability of the Education data and determined the data were sufficiently reliable for the purposes of this study. We obtained from VA the Chapter 30 GI benefit amount for servicemembers in academic year 2005 to 2006. To address the second and third objectives, we reviewed laws and regulations, reviewed Education and VA documents, and interviewed agency officials responsible for administering Title IV aid programs and GI benefits programs. To obtain information about how schools allocate Title IV aid and provide information to veteran students, we interviewed financial aid officials and officials dedicated to veterans' issues at eight schools selected based on diversity in number of students, number of veterans, and other factors. We also interviewed representatives of education and veteran interest groups to obtain their perspectives on these issues.

On May 20, 2008, we briefed your office on the results of our analysis. This report formally conveys the information provided in that briefing (see app. I). In summary, we found the following:

- Overall, veteran students received similar amounts of Title IV aid as nonveteran, independent students.⁴ However, when including Chapter 30 GI benefits, veterans received more total federal aid than nonveterans. (See app. III for more data on receipt of federal aid.)
- Laws and regulations largely dictate how higher education institutions allocate Title IV aid among veteran and nonveteran students, but five of the eight schools we interviewed used their limited flexibility to allow veterans to be eligible for larger amounts of certain types of Title IV aid.

³Our scope does not include reservists who can receive benefits under 10 U.S.C. Chapter 1606 (Montgomery GI Bill—Selected Reserve) and Chapter 1607 (Reserve Educational Assistance Program).

⁴The numbers for the campus-based aid programs were not significantly different at the 95 percent confidence interval. These data are based on survey responses from the National Postsecondary Student Aid Study for 2003 to 2004.

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- While federal agencies and schools provide the same information on Title IV aid to all students, some of the schools we interviewed in areas with nearby military bases reach out to veteran students. In addition, there are some recent federal efforts to inform veterans about Title IV aid, such as workshops on federal aid for personnel separating from the military.

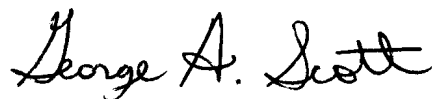
We conducted this performance audit from February through June 2008 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. (See app. II for a more detailed scope and methodology.)

We provided a draft of this report to the Department of Education for review. The Department of Education had no formal comments but provided technical comments, which we incorporated where appropriate. In addition, the Department of Veterans Affairs reviewed the draft report and had no comments.

We are sending copies of this report to the Departments of Education and Veterans Affairs, relevant congressional committees, and other interested parties. We will also make copies available to others on request. In addition, the report will be available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or scottg@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs are listed on the last page of this report. GAO staff who have made major contributions to this report are listed in appendix IV.

Sincerely yours,



George A. Scott
Director, Education, Workforce,
and Income Security

Appendix I: Briefing Slides on Title IV Aid

Appendix I



Veteran Students Received Similar Amounts of Title IV Aid As Nonveterans but More Total Aid with GI Benefits

**Briefing for the Subcommittee on Economic
Opportunity, Committee on Veterans' Affairs,
House of Representatives**

May 20, 2008

GAO-08-741

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Introduction

- The rising cost of college affects all students, who rely on a mix of family resources, grants, scholarships, and loans to finance their education. Further, some lenders have tightened eligibility criteria for obtaining student loans.
- In fiscal year 2007, \$82 billion in financial aid in the form of grants, loans, and work-study under Title IV of the Higher Education Act of 1965 was provided to 11 million students and their families (referred to as Title IV aid). The Department of Education (Education) administers Title IV programs.
- Veterans may also be eligible for education benefits from the Department of Veterans Affairs (VA). VA awarded about \$2 billion in Chapter 30 education benefits under the Montgomery GI Bill¹ (Chapter 30 GI benefits) to over 300,000 veteran students in fiscal year 2007.
- Our prior work found that veteran students were awarded similar amounts of Title IV aid as nonveteran students, and veterans' total federal aid was greater when Chapter 30 GI benefits were included.² Interest has been expressed in knowing whether this has changed, resulting in veterans receiving less federal financial aid.

¹Montgomery GI Bill at 38 U.S.C. Chapter 30.

²GAO, *Veterans' Education Benefits: Comparison of Federal Assistance Awarded to Veteran and Nonveteran Students*, GAO-02-368 (Washington, D.C.: Feb. 28, 2002).



Key Questions

- 1) How does the amount of Title IV financial aid awarded to veteran students compare with that awarded to nonveteran students?
 - 2) How do higher education institutions allocate Title IV financial aid among veteran and nonveteran students?
 - 3) How do federal agencies and higher education institutions provide information to veterans on Title IV financial aid?
-



Scope and Methodology

- We compared veteran students to nonveteran, independent students (referred to in this report as nonveterans). Education considers veterans to be independent students for Title IV aid purposes. Our scope included both veterans and active-duty personnel who served for 3 or more years and received Chapter 30 education benefits under the Montgomery GI Bill (referred to as veterans).³
- We used the most recent Education data available to compare amounts of Title IV aid awarded to veteran and nonveteran students in their first year of full-time study.⁴
- We obtained from VA the Chapter 30 GI benefit amount for servicemembers for the 2005 to 2006 academic year.
- We reviewed laws and regulations on how higher education institutions (referred to as schools) award Title IV aid.
- We interviewed Education and VA officials and reviewed agency documents.

³Our scope did not include reservists. Reservists can receive benefits under 10 U.S.C. Chapter 1606 (Montgomery GI Bill-Selected Reserve) and Chapter 1607 (Reserve Educational Assistance Program).

⁴We used 2005 to 2006 data for Pell Grant and Stafford Loans and 2003 to 2004 data for campus-based aid.



Scope and Methodology

- We interviewed financial aid officials and officials dedicated to veterans' issues at eight schools, as well as representatives of education and veteran organizations.
 - We selected a nonprobability sample of schools based on diversity in total number of undergraduate students, number of veteran students receiving GI benefits, geographic location, and school type (e.g., 2- or 4-year public or private). We cannot generalize our findings beyond these schools.
- We conducted this performance audit from February through June 2008 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Note: See Appendix II for a more detailed scope and methodology.

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Summary of Key Findings

- Overall, veteran students received similar amounts of Title IV aid as nonveteran students.⁵ However, when including Chapter 30 GI benefits, veterans received more total federal aid than nonveterans.
- Laws and regulations largely dictate how schools allocate Title IV aid among veteran and nonveteran students. However, five of the eight schools we interviewed used their limited flexibility to allow veterans to be eligible for larger amounts of certain types of Title IV aid.
- While federal agencies and schools provide the same information on Title IV aid to all students, two of the schools we interviewed reach out to veteran students at nearby military bases. In addition, in 2007, Education began new efforts to inform veterans about Title IV aid, such as workshops on federal aid for personnel separating from the military.

⁵The numbers for the campus-based aid programs were not significantly different at the 95 percent confidence interval.

Background



Education's Title IV Financial Assistance— Federal Student Aid Administered by the Department of Education

Title IV student aid program	Program details and eligibility criteria	Annual award amounts for first-year undergraduates
Federal Pell Grants	<ul style="list-style-type: none"> • Undergraduate students with financial need • Student must be enrolled in a degree or certificate program • Grant does not need to be repaid 	<ul style="list-style-type: none"> • \$400 to \$4,050 (award year 2005 to 2006) • \$400 to \$4,310 (award year 2007 to 2008)
Subsidized Stafford Loans	<ul style="list-style-type: none"> • Undergraduate and graduate students with financial need • Student must be enrolled at least half-time in an eligible program of study • Federal government pays interest while student is in school, for 6 months after student leaves school, and during a deferment period 	<ul style="list-style-type: none"> • Up to \$2,625 (academic year 2005 to 2006) • Up to \$3,500 (academic year 2007 to 2008)
Unsubsidized Stafford Loans	<ul style="list-style-type: none"> • Undergraduate and graduate students; not based on financial need • Student must be enrolled at least half-time in an eligible program of study • Federal government does not pay interest; student responsible for all interest costs 	<ul style="list-style-type: none"> • Up to \$6,625 for independent undergraduates (including any subsidized loan amounts received for the same period) (academic year 2005 to 2006) • Up to \$7,500 for independent undergraduates (including any subsidized loan amounts received for the same period) (academic year 2007 to 2008)

Background



Education’s Title IV Financial Assistance— Federal Student Aid Administered by Schools (Campus-Based Aid)

Title IV student aid program	Program details and eligibility criteria	Annual award amounts for first-year undergraduates
Federal Supplemental Educational Opportunity Grants (FSEOG)	<ul style="list-style-type: none"> • Given first to undergraduate students with exceptional financial need • Priority given to Pell Grant recipients • Schools must pay at least 25 percent of award amounts • Grants do not have to be repaid 	<ul style="list-style-type: none"> • \$100 to \$4,000, except up to \$4,400 for a study-abroad program (award year 2005 to 2006 and award year 2007 to 2008)
Federal Perkins Loans	<ul style="list-style-type: none"> • Undergraduate and graduate students with exceptional financial need are given priority • Schools must match at least one-third of the federal funds allocated to make low-interest (5 percent) loans • Interest does not accrue while student is enrolled at least half-time in eligible study program 	<ul style="list-style-type: none"> • Up to \$4,000 (award year 2005 to 2006 and award year 2007 to 2008)
Federal Work-Study (FWS)	<ul style="list-style-type: none"> • Undergraduate and graduate students with financial need • Students are provided on- or off-campus jobs paying at least current federal minimum wage • School or off-campus employer pays at least 25 percent of the student's wages 	<ul style="list-style-type: none"> • No annual minimum or maximum award amounts up to student’s financial need (award year 2005 to 2006 and award year 2007 to 2008)

Background



VA's Education Benefits Under GI Bill (Chapter 30 GI benefits)

Montgomery GI Bill Benefits:

- **Eligibility:** Veterans who met their duty obligation and were honorably discharged and active-duty personnel. To receive Chapter 30 GI benefits, servicemembers must contribute \$100 per month for the first 12 months of service.
- **Benefit amount and use:** In academic year 2005 to 2006, individuals who completed 3 or more years of active duty service and were attending a college or university full-time received \$1,034 per month for a maximum of 36 months.⁶
 - Although outside the scope of our work, the GI Bill provides smaller benefit amounts to reservists.⁷
- In addition to GI education benefits, VA also has a work-study program and VA noneducation benefits, such as disability benefits.

⁶We scoped our work to individuals who met these criteria, but GI benefit amounts for others depend on length of military service, type of service (active duty or reservist), and school enrollment status.

⁷10 U.S.C. Chapter 1606 (Montgomery GI Bill—Selected Reserve). In addition, 10 U.S.C. Chapter 1607 (Reserve Educational Assistance Program) provides benefits to reservists.

Comparing Total Federal Student Aid for Veterans and Nonveterans



Veterans Received Similar Title IV Aid As Nonveterans but More Total Aid with Chapter 30 GI Benefits

Type of federal aid	Veteran students (average aid amount)	Nonveteran, independent students (average aid amount)
Pell Grant (2005 to 2006)	\$2,322	\$2,482
Subsidized Stafford Loan (2005 to 2006)	\$2,082	\$2,109
Unsubsidized Stafford Loan (2005 to 2006)	\$2,959	\$2,945
Campus-based Aid (2003 to 2004)	\$1,450 ^a (estimate)	\$1,300 ^a (estimate)
Chapter 30 GI Benefits (2005 to 2006)	\$9,306	n/a

Sources: For Pell Grants and Stafford Loans, U.S. Department of Education (2005 to 2006 is most recent student-level data). For campus-based aid, National Postsecondary Student Aid Study provides data based on survey responses (2003 to 2004 is most recent student-level data). For Chapter 30 GI benefits, U.S. Department of Veterans Affairs. We used the Chapter 30 GI Benefit rate for 2005 to 2006 to be consistent with the most recent data available from Education for Title IV aid amounts.

^aThese numbers were not significantly different at the 95 percent confidence level.

Note: Data are for first-year, full-time students. These are average aid amounts and may not reflect the total aid received by any individual student.

Veterans Received Slightly Lower Pell Grants Due to Higher Income, Rather Than Chapter 30 GI Benefits

- Veterans received, on average, 6 percent less in Pell Grants than nonveterans in academic year 2005 to 2006—the most recent year for which these data are available.
- Veteran students tend to have higher incomes than nonveteran students, generally making them eligible for less in Pell Grants.⁸ Chapter 30 GI benefits are not counted as income in determining veterans' eligibility for Pell Grants, so any differences in aid are not due to receipt of Chapter 30 GI benefits.
 - For example in academic year 2005 to 2006, at the 75th percentile in income, veterans attending public 2-year schools earned an average of \$38,550 the year before starting school, compared to \$33,259 for nonveterans at the same percentile. With these higher incomes, veterans at this percentile were eligible for a Pell Grant of \$1,600, compared to \$2,100 for nonveterans.

⁸See appendix III for amounts of aid veteran and nonveteran students were eligible for across income levels and types of schools they attended.

Comparing Total Federal Student Aid for Veterans and Nonveterans



Veterans Received Similar Amounts of Stafford Loans and Campus-Based Aid As Nonveterans

- Veterans received similar amounts of subsidized and unsubsidized Stafford Loans as nonveterans in academic year 2005 to 2006—the most recent year for which these data are available.
- Veterans also received similar amounts as nonveterans of campus-based aid (Federal Supplemental Educational Opportunity Grants, Perkins Loans, and Federal Work-Study) in academic year 2003 to 2004—the most recent year for which these data are available.⁹

⁹These numbers were not significantly different at the 95 percent confidence level.

How Institutions Allocate Title IV Aid among Veterans and Nonveterans



Schools Have Limited Flexibility in Allocating Title IV Aid among Veterans and Nonveterans

- Laws and regulations largely dictate how schools allocate Title IV aid among veteran and nonveteran students.
- However, five of the eight schools we interviewed used their limited flexibility to allow veterans to be eligible for larger amounts of certain types of Title IV aid than nonveterans.
- The following slide illustrates the process by which these schools determine a student's need and eligibility for Title IV aid, including where the schools have flexibility in this process.

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Process Schools Follow to Determine Students' Need and Eligibility for Title IV Aid

Step 1	<p>Cost of attendance (COA)</p> <p>– Expected family contribution (EFC)</p> <hr/> <p>= Financial need</p>	<p>COA includes items such as tuition and fees, books, supplies, transportation, and personal expenses.</p> <p>EFC is determined based on income, assets, and benefits. Includes VA noneducation benefits.</p>
Step 2	<p>– Pell Grant, if received</p> <hr/> <p>= Remaining need</p>	<p>► Schools may reduce the values of the data items used to calculate the EFC based on special circumstances for any student on a case-by-case basis.</p>
Step 3	<p>– Estimated financial assistance (EFA)</p> <hr/> <p>= Final remaining need</p>	<p>EFA includes loans, grants, and scholarships. Includes Montgomery GI Bill–Active Duty (Chapter 30 GI benefits) veterans education benefits, with two exceptions:</p>
Step 4	<p>Award additional Title IV aid as available to meet final remaining need</p>	<p>► Law requires schools to exclude Chapter 30 GI benefits from EFA when determining eligibility for subsidized Stafford Loans.</p> <p>► In awarding aid under the campus-based aid programs to veterans, the regulations provide an option to schools to exclude from EFA any portion of a subsidized Stafford Loan that is equal to or less than the Chapter 30 GI benefits.</p>

Source: Department of Education's Federal Student Aid Handbook.

Note: Text in bold indicates areas in which schools have flexibility in awarding Title IV financial aid.

Some Aspects of Title IV Are Advantageous to Veterans When Determining Eligibility

- Chapter 30 GI benefits are not counted as income in expected family contribution (EFC), so receiving Chapter 30 GI benefits does not affect a veteran's eligibility for a Pell Grant.
- Chapter 30 GI benefits—unlike scholarships—are not counted as a resource in estimated financial assistance (EFA) when determining eligibility for subsidized Stafford Loans.¹⁰ As a result, a veteran receiving Chapter 30 GI benefits would be eligible to receive a larger subsidized Stafford Loan than a nonveteran receiving the same amount in scholarships.¹¹
- Opinions differ on whether veterans should have these advantages over other students. Some veterans' interest groups and school officials we interviewed believe that the law should give veterans a greater advantage by not including Chapter 30 GI benefits as a resource in calculating eligibility for all Title IV aid. In contrast, some others believe that Chapter 30 GI benefits should be considered like any other financial resource, for example, a nonveteran student's scholarship.

¹⁰However, Chapter 30 GI benefits are considered in determining eligibility for unsubsidized Stafford Loans.

¹¹Individual veterans may be eligible for more Title IV aid but received, on average, similar amounts as nonveterans in academic year 2005 to 2006. Contributing factors may include income and students' decisions to not take loans for which they were eligible.

How Institutions Allocate Title IV Aid among Veterans and Nonveterans



Flexibilities Allow Schools to Make Veterans Eligible for Larger Amounts of Certain Types of Title IV Aid

Schools have flexibility at two points in the Title IV allocation process:

- For veteran students, with respect to campus-based aid, schools can exclude subsidized Stafford Loans, if any, up to the amount the student receives in Chapter 30 GI benefits from the student's EFA. As a result, a veteran receiving Chapter 30 GI benefits can be eligible for more campus-based aid than a nonveteran receiving a comparable scholarship.¹² Five of the eight schools we interviewed reported using this flexibility.
- For all students, including veterans, schools can use discretion in calculating eligibility for Title IV aid to account for special circumstances that are not reflected in a student's financial aid application.
 - Special circumstances could include a change in family income, death of a family member, or high medical expenses.
 - The eight schools we interviewed told us they rarely used this discretion to account for special circumstances for either veteran or nonveteran students.

¹²Individual veterans may be eligible for more Title IV aid but received, on average, similar estimated amounts as nonveterans in academic year 2003 to 2004. A contributing factor may be the amount of campus-based aid available at a particular school.

Agencies and Schools Have Some Targeted Efforts to Inform Veterans about Title IV Aid

- Department of Education makes Title IV information available to all students, including veterans, on its Web site, and provides training and information to school financial aid officers who deal directly with students.
- Education recently has begun coordinating with the Departments of Labor (Labor), Veterans Affairs (VA), and Defense (DOD) to provide Title IV aid information to veterans.
 - Education provides Title IV information for a VA newsletter to Iraq and Afghanistan veterans.
 - Education and Labor conduct presentations to active-duty personnel separating from the military. Labor is the lead agency for personnel transitioning from active-duty to veteran status.
 - Labor, VA, and DOD provide Web site for separating personnel.
- VA does not provide any information about Title IV directly to students, but rather refers students with Title IV questions to school financial aid offices.

Information to Veterans on Title IV Aid



Schools in Areas with Nearby Military Bases Have Some Targeted Outreach

- While schools we interviewed primarily provide the same Title IV information to all students, two of the schools we interviewed have targeted outreach to veterans at nearby military bases.
- At the eight schools we interviewed, officials dedicated to veterans' issues provide assistance with GI benefits but refer veterans to financial aid officers for information about Title IV, as appropriate.¹³
- In addition to school officials' efforts related to veterans, only one of the schools we interviewed reported having a student veterans' group on campus.
 - One of the veterans' interest groups we interviewed also highlighted a new association for student veterans' groups nationwide.

¹³At two of the eight schools we interviewed, veterans' officials were located in the same office as the financial aid officers to increase coordination.

Information to Veterans on Title IV Aid



Views on Veterans' Awareness of Federal Aid

Schools and interest groups we interviewed described the following range of views on veterans' awareness of federal aid:

- Some veterans may be more savvy about federal financial aid, perhaps based on their experience receiving Chapter 30 GI benefits and their network with other veterans.
- Some students—both veteran and nonveteran—may be unaware or confused about Title IV aid.
- Some veterans may think that their Chapter 30 GI benefits will cover all their school costs, but in some cases, they do not.
- Some veterans may be aware of Title IV aid but mistakenly think they are not eligible due to Chapter 30 GI benefits.



Concluding Observations

- Similar to our findings in 2002, veteran students received about the same amounts of Title IV aid as nonveteran students and, further, had similar opportunities to learn about Title IV aid. In some cases, Title IV could provide advantages to veterans, such as an option for schools to exclude Chapter 30 GI benefits when awarding campus-based aid.
- However, our report does not address how the federal financial aid amounts reservists receive compare with other students. This may warrant further inquiry given the increasing number of reservists who have been called to active duty in recent years, as well as important differences in their receipt of GI benefits.

Appendix II: Objectives, Scope, and Methodology

The objectives of our study were to determine (1) how the amount of Title IV financial aid awarded to veteran students compares with that awarded to nonveteran students, (2) how higher education institutions allocate Title IV financial aid among veteran and nonveteran students, and (3) how federal agencies and higher education institutions provide information to veterans on Title IV financial aid. To address these issues, we obtained data on federal student aid from the Department of Education (Education), reviewed laws and regulations, and interviewed officials at Education, the Department of Veterans Affairs (VA), and higher education institutions, as well as representatives of education and veterans groups.

Education Data on Title IV Aid

We used the most recent Education data available to compare amounts of Title IV aid awarded to veteran and nonveteran students in their first year of full-time study. The specific year and type of data differ by type of aid.

For Pell Grants and Stafford Loans, the most recent student-level data available are from academic year 2005 to 2006.

- When reporting average aid amounts for veteran students and nonveteran independent students across all incomes and school types combined (slide 10), we used the amounts of aid actually *received*.
- When differentiating among income levels and school types (appendix III), we reported the aid amounts for which each type of student was *eligible*. We asked Education to estimate the amount of Title IV aid awarded to the following populations: (1) veteran students; (2) nonveteran, independent students; and (3) nonveteran, dependent students who were in their first year of enrollment on a full-time basis at a public 2-year, public 4-year, private 4-year, or proprietary institution. For each of these populations, Education identified the 25th, 50th, and 75th family income percentiles and the amount of Pell Grant and Stafford Loans awarded to students at these income levels, based on the average cost of attendance for each type of institution. Information on students attending private 2-year schools were excluded due to lack of reliable data.
- To assess the reliability of the Pell Grant and Stafford Loan data, we interviewed Department of Education officials to identify (1) the system used to produce the data and the purpose of this system; (2) how and where the data are collected; (3) their view of the data quality, including its completeness and accuracy; (4) any data limitations, such as incomplete or incorrect data elements, that could affect the use of the data; and (5) any changes to data system procedures since the 2002

report—which used 1999 to 2000 data—that would affect the 2005 to 2006 data. We determined that the data on Pell Grants and Stafford Loans were sufficiently reliable for the purposes of this study. We also asked the Education officials who provided the data to confirm that they calculated the Title IV aid amounts using the same method that they used for our 2002 report.¹

For campus-based aid, the most recent student-level data are from the 2004 National Postsecondary Student Aid Study, which reflects aid amounts students reported receiving in academic year 2003 to 2004.

- To assess the reliability of campus-based aid data we reviewed related documents and performed electronic data testing of these data elements. We determined that the data were sufficiently reliable for the purposes of this study.

Our report findings are based on the comparison of veteran students with nonveteran, independent students because veterans are considered independent students for Title IV aid purposes. Independent students also include, for example, those who are married or supporting children. Unlike independent students, dependent students must report their parents' income and assets, as well as their own, when applying for federal student aid. Federal student aid programs are based on the concept that a dependent student's parents have the primary responsibility for paying for their child's education. Appendix III includes data on Title IV aid for veteran; nonveteran, independent; and nonveteran, dependent students.

VA Information on Chapter 30 GI Benefits

We obtained from VA the Chapter 30 GI benefit amount for servicemembers in academic year 2005 to 2006. Our scope included both veterans and active-duty personnel who served for 3 or more years and received Chapter 30 GI benefits under the Montgomery GI Bill. The GI benefit rate for veterans who had completed an enlistment of 3 years or more and were attending school full-time for an academic year of 9 months was \$1,034 per month in the 2005 to 2006 academic year. We used the rate from academic year 2005 to 2006 to match the time period of the Pell Grant and Stafford Loan data.

¹GAO, *Veterans' Education Benefits: Comparison of Federal Assistance Awarded to Veteran and Nonveteran Students*, [GAO-02-368](#) (Washington, D.C.: Feb. 28, 2002).

Our scope did not include reservists. Reservists can receive benefits under 10 U.S.C. Chapter 1606 (Montgomery GI Bill—Selected Reserve) and Chapter 1607 (Reserve Educational Assistance Program).

Review of Federal Laws, Regulations, and Other Documents

We reviewed laws, regulations, and Education and VA documents to identify the type of federal aid available under Title IV programs and how schools determine students' eligibility for Title IV aid, including how GI benefits are treated in awarding this aid. We also interviewed officials at Education and VA responsible for administering Title IV aid programs and GI benefits programs.

Interviews with School Officials

We interviewed financial aid officials and officials dedicated to veterans' issues at eight schools to obtain information about how schools allocate Title IV aid and provide information to veteran students. We selected a nonprobability sample of schools based on diversity in total number of undergraduate students, number of veteran students receiving GI benefits, school type, and geographic location. We cannot generalize our findings beyond these schools. The eight schools are listed below by school type.

- Public 2-year schools
 - Asnuntuck Community College (CT)
 - Central Texas College (TX)
- Public 4-year schools
 - University of Arkansas (AR)
 - University of Maryland University College (MD)
- Private 4-year (not-for-profit) schools
 - St. Ambrose University (IA)
 - Whittier College (CA)
- Proprietary (for profit) schools
 - Colorado Technical University (CO)
 - University of Phoenix (AZ)

Interviews with Interest Groups

We interviewed representatives of the following education and veterans' interest groups to obtain their perspectives on these issues.

- Education groups
 - National Association of Student Financial Aid Administrators (NASFAA)
 - Advisory Committee on Student Financial Assistance
- Veterans' groups
 - National Association of Veterans' Program Administrators (NAVPA)
 - Veterans of Foreign Wars of the United States (VFW)
 - Iraq and Afghanistan Veterans of America (IAVA)

We conducted this performance audit from February through June 2008 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix III: Estimated Federal Title IV Aid Awarded to Students

The following four tables provide estimates of the amount of Pell Grant, subsidized Stafford Loan, and unsubsidized Stafford Loan aid awarded to veteran and nonveteran students at public 2-year, public 4-year, private 4-year, and proprietary institutions, and the amount of Chapter 30 GI benefits available in academic year 2005 to 2006. In the briefing slides (see app. I), we compare veteran students to nonveteran independent students because veterans are considered independent students for Title IV aid purposes. However, in this appendix, we provide aid estimates for veteran and nonveteran, independent students, as well as nonveteran, dependent students.

Table 1: Estimated Aid Awarded to First-Year Students Attending Public 2-Year Institutions Full-Time in Academic Year 2005 to 2006, by Income Level and Veteran Status

Average cost of attendance = \$11,692

	Veteran student		Nonveteran independent student ^a		Nonveteran dependent student ^b	
	Income =		Income =		Income =	
25 th income percentile ^c		\$5,879		\$4,000		\$14,039
	EFC =	0	EFC =	0	EFC =	0
Pell Grant		4,050		4,050		4,050
Subsidized Stafford Loan		2,625		2,625		2,625
Unsubsidized Stafford Loan		0		4,000		0
Chapter 30 GI benefit ^d		9,306		0		0
Total aid		\$15,981		\$10,675		\$6,675
50th income percentile		\$17,241		\$14,400		\$33,400
	EFC =	4,189	EFC =	0	EFC =	2,037
Pell Grant		0		4,050		2,000
Subsidized Stafford Loan		2,625		2,625		2,625
Unsubsidized Stafford Loan		0		4,000		0
Chapter 30 GI benefit		9,306		0		0
Total aid		\$11,931		\$10,675		\$4,625
75th income percentile		\$38,550		\$33,259		\$70,262
	EFC =	2,411	EFC =	1,912	EFC =	11,503
Pell Grant		1,600		2,100		0
Subsidized Stafford Loan		2,625		2,625		0
Unsubsidized Stafford Loan		0		4,000		0
Chapter 30 GI benefit		9,306		0		0
Total aid		\$13,531		\$8,725		\$0

Sources: For Pell Grants and Stafford Loans, U.S. Department of Education. For Chapter 30 GI benefits, U.S. Department of Veterans Affairs.

**Appendix III: Estimated Federal Title IV Aid
Awarded to Students**

Notes: Average cost of attendance at a public 2-year institution for the 2005 to 2006 academic year was \$11,692. The Department of Education calculated expected family contribution (EFC) using a weighted average of the EFC across students with different family characteristics within each student classification—veteran (always classified as independent), nonveteran independent, and nonveteran dependent. For each EFC/cost of attendance combination for each category of student, the Department of Education determined the maximum Pell Grant and Stafford Loan amounts for a full-time, first-year student. Pell Grant amounts were determined according to the Pell Grant payment schedule for 2005 to 2006 (maximum award = \$4,050). The subsidized Stafford Loan amount is the lesser of (1) cost of attendance minus the sum of EFC plus Pell Grant or (2) the maximum subsidized loan for a first-year student (\$2,625). The unsubsidized Stafford Loan amount is the lesser of (1) cost of attendance minus the sum of Pell plus subsidized Stafford Loan plus other financial assistance (i.e., GI Bill for veterans) or (2) the maximum additional unsubsidized loan for a first-year, independent student (\$4,000).

The EFCs are median values for each combination of income quartile and student type. The federal need analysis provides for larger income offsets, and to some extent, smaller asset assessments for independent students with dependents of their own, compared to other independents. So, financial aid applicants and recipients with larger families would tend to have lower EFCs.

^aUnsubsidized Stafford Loan amounts for nonveteran, independent students assume this population has no other financial assistance, such as outside scholarships, that may reduce the amount in unsubsidized loans for which this group may be eligible.

^bParents of dependent students have several credit options for financing their child's education, including home equity, private loans, and federal PLUS loans. PLUS loans are available under Title IV of the Higher Education Act and are loans made to parents of dependent, undergraduate students enrolled at least half-time in an eligible program of study. Borrowers are responsible for paying all interest on the loan. The maximum amount that a parent may borrow through a PLUS loan is equal to the student's cost of attendance minus all other assistance. Among dependent students who attended public 2-year institutions in academic year 2003 to 2004, less than 1% received PLUS loans.

^cAmong students attending public 2-year institutions, the Department of Education determined the 25th percentile, 50th percentile, and 75th percentile of family income in each student classification (veteran, nonveteran independent, and nonveteran dependent).

^dChapter 30 GI Bill benefit amount is based on academic year 2005 to 2006 rates of \$1,034 per month (Ch. 30 of Title 38 U.S.C.—Montgomery GI Bill Active Duty) for veterans who have completed an enlistment of 3 years or more and are attending school full-time for an academic year of 9 months.

**Appendix III: Estimated Federal Title IV Aid
Awarded to Students**

Table 2: Estimated Aid Awarded to First-Year Students Attending Public 4-Year Institutions Full-Time in Academic Year 2005 to 2006, by Income Level and Veteran Status

Average cost of attendance = \$15,566

	Veteran student		Nonveteran independent student^a		Nonveteran dependent student^b	
25th income percentile ^c	Income =	\$4,010	Income =	\$3,099	Income =	\$22,382
	EFC =	0	EFC =	0	EFC =	245
Pell Grant		4,050		4,050		3,800
Subsidized Stafford Loan		2,625		2,625		2,625
Unsubsidized Stafford Loan		0		4,000		0
Chapter 30 GI benefit ^d		9,306		0		0
Total aid		\$15,981		\$10,675		\$6,425
50th income percentile	Income =	\$15,522	Income =	\$13,745	Income =	\$55,050
	EFC =	3,625	EFC =	2,816	EFC =	6,680
Pell Grant		400		1,200		0
Subsidized Stafford Loan		2,625		2,625		2,625
Unsubsidized Stafford Loan		0		4,000		0
Chapter 30 GI benefit		9,306		0		0
Total aid		\$12,331		\$7,825		\$6,225
75th income percentile	Income =	\$44,784	Income =	\$37,995	Income =	\$105,109
	EFC =	4,607	EFC =	5,658	EFC =	22,712
Pell Grant		0		0		0
Subsidized Stafford Loan		2,625		2,625		0
Unsubsidized Stafford Loan		0		4,000		0
Chapter 30 GI benefit		9,306		0		0
Total aid		\$11,931		\$6,625		\$0

Sources: For Pell Grants and Stafford Loans, U.S. Department of Education. For Chapter 30 GI benefits, U.S. Department of Veterans Affairs.

Note: Average cost of attendance at a public 4-year institution for the 2005 to 2006 academic year was \$15,566. The Department of Education calculated expected family contribution (EFC) using a weighted average of the EFC across students with different family characteristics within each student classification—veteran (always classified as independent), nonveteran independent, and nonveteran dependent. For each EFC/cost of attendance combination for each category of student, the Department of Education determined the maximum Pell Grant and Stafford Loan amounts for a full-time, first-year student. Pell Grant amounts were determined according to the Pell Grant payment schedule for 2005 to 2006 (maximum award = \$4,050). The subsidized Stafford Loan amount is the lesser of (1) cost of attendance minus the sum of EFC plus Pell Grant or (2) the maximum subsidized loan for a first-year student (\$2,625). The unsubsidized Stafford Loan amount is the lesser of (1) cost of attendance minus the sum of Pell plus subsidized Stafford Loan plus other financial assistance (i.e.—GI Bill for veterans) or (2) the maximum additional unsubsidized loan for a first-year, independent student (\$4,000).

**Appendix III: Estimated Federal Title IV Aid
Awarded to Students**

^aUnsubsidized Stafford Loan amounts for nonveteran, independent students assume this population has no other financial assistance, such as outside scholarships, that may reduce the amount in unsubsidized loans for which this group may be eligible.

^bParents of dependent students have several credit options for financing their child's education, including home equity, private loans, and federal PLUS loans. PLUS loans are available under Title IV of the Higher Education Act and are loans made to parents of dependent undergraduate students enrolled at least half-time in an eligible program of study. Borrowers are responsible for paying all interest on the loan. The maximum amount that a parent may borrow through a PLUS loan is equal to the student's cost of attendance minus all other assistance. Among dependent students who attended public 4-year institutions in academic year 2003 to 2004, 7.5% received PLUS loans.

^cAmong students attending public 4-year institutions, the Department of Education determined the 25th percentile, 50th percentile, and 75th percentile of family income in each student classification (veteran, nonveteran independent, and nonveteran dependent).

^dChapter 30 GI Bill benefit amount is based on academic year 2005 to 2006 rates of \$1,034 per month (Ch. 30 of Title 38 U.S.C.—Montgomery GI Bill Active Duty) for veterans who have completed an enlistment of 3 years or more and are attending school full-time for an academic year of 9 months.

**Appendix III: Estimated Federal Title IV Aid
Awarded to Students**

Table 3: Estimated Aid Awarded to First-Year Students Attending Private (Not-for-Profit) 4-Year Institutions Full-time in Academic Year 2005 to 2006, by Income Level and Veteran Status

Average cost of attendance = \$31,916

	Veteran student		Nonveteran independent student^a		Nonveteran dependent student^b	
25th income percentile ^c	Income =	\$8,931	Income =	\$3,599	Income =	\$25,277
	EFC =	1,021	EFC =	0	EFC =	716
Pell Grant		3,000		4,050		3,300
Subsidized Stafford Loan		2,625		2,625		2,625
Unsubsidized Stafford Loan		4,000		4,000		0
Chapter 30 GI benefit ^d		9,306		0		0
Total aid		\$18,931		\$10,675		\$5,925
50th income percentile	Income =	\$30,553	Income =	\$18,826	Income =	\$64,784
	EFC =	1,763	EFC =	4,410	EFC =	9,467
Pell Grant		2,300		0		0
Subsidized Stafford Loan		2,625		2,625		2,625
Unsubsidized Stafford Loan		4,000		4,000		0
Chapter 30 GI benefit		9,306		0		0
Total aid		\$18,231		\$6,625		\$2,625
75th income percentile	Income =	\$69,234	Income =	\$52,078	Income =	\$121,989
	EFC =	12,453	EFC =	7,432	EFC =	27,335
Pell Grant		0		0		0
Subsidized Stafford Loan		2,625		2,625		2,625
Unsubsidized Stafford Loan		4,000		4,000		0
Chapter 30 GI benefit		9,306		0		0
Total aid		\$15,931		\$6,625		\$2,625

Sources: For Pell Grants and Stafford Loans, U.S. Department of Education. For Chapter 30 GI benefits, U.S. Department of Veterans Affairs.

Note: Average cost of attendance at a private 4-year institution for the 2005 to 2006 academic year was \$31,916. The Department of Education calculated expected family contribution (EFC) using a weighted average of the EFC across students with different family characteristics within each student classification—veteran (always classified as independent), nonveteran independent, and nonveteran dependent. For each EFC/cost of attendance combination for each category of student the Department of Education determined the maximum Pell Grant and Stafford Loan amounts for a full-time, first-year student. Pell Grant amounts were determined according to the Pell Grant payment schedule for 2005 to 2006 (maximum award = \$4,050). The subsidized Stafford Loan amount is the lesser of (1) cost of attendance minus the sum of EFC plus Pell Grant or (2) the maximum subsidized loan for a first-year student (\$2,625). The unsubsidized Stafford Loan amount is the lesser of (1) cost of attendance minus the sum of Pell plus subsidized Stafford Loan plus other financial assistance (i.e.—GI Bill for veterans) or (2) the maximum additional unsubsidized loan for a first-year, independent student (\$4,000).

**Appendix III: Estimated Federal Title IV Aid
Awarded to Students**

^aUnsubsidized Stafford Loan amounts for nonveteran, independent students assume this population has no other financial assistance, such as outside scholarships, that may reduce the amount in unsubsidized loans for which this group may be eligible.

^bParents of dependent students have several credit options for financing their child's education, including home equity, private loans, and federal PLUS loans. PLUS loans are available under Title IV of the Higher Education Act and are loans made to parents of dependent, undergraduate students enrolled at least half-time in an eligible program of study. Borrowers are responsible for paying all interest on the loan. The maximum amount that a parent may borrow through a PLUS loan is equal to the student's cost of attendance minus all other assistance. Among dependent students who attended private 4-year institutions in academic year 2003 to 2004, 12.5% received PLUS loans.

^cAmong students attending private 4-year institutions, the Department of Education determined the 25th percentile, 50th percentile, and 75th percentile of family income in each student classification (veteran, nonveteran independent, and nonveteran dependent).

^dChapter 30 GI Bill benefit amount is based on academic year 2005 to 2006 rates of \$1,034 per month (Ch. 30 of Title 38 U.S.C.—Montgomery GI Bill Active Duty) for veterans who have completed an enlistment of 3 years or more and are attending school full-time for an academic year of 9 months.

**Appendix III: Estimated Federal Title IV Aid
Awarded to Students**

Table 4: Estimated Aid Awarded to First-Year Students Attending Proprietary (For-Profit) Institutions Full-time in Academic Year 2005 to 2006, by Income Level and Veteran Status

Average cost of attendance = \$22,931

	Veteran student		Nonveteran independent student^a		Nonveteran dependent student^b	
25th income percentile ^c	Income =	\$9,000	Income =	\$4,200	Income =	\$11,448
	EFC =	912	EFC =	0	EFC =	0
Pell Grant		3,100		4,050		4,050
Subsidized Stafford Loan		2,625		2,625		2,625
Unsubsidized Stafford Loan		4,000		4,000		0
Chapter 30 GI benefit ^d		9,306		0		0
Total aid		\$19,031		\$10,675		\$6,675
50th income percentile	Income =	\$26,290	Income =	\$15,671	Income =	\$31,554
	EFC =	1,329	EFC =	0	EFC =	1,649
Pell Grant		2,700		4,050		2,400
Subsidized Stafford Loan		2,625		2,625		2,625
Unsubsidized Stafford Loan		4,000		4,000		0
Chapter 30 GI benefit		9,306		0		0
Total aid		\$18,631		\$10,675		\$5,025
75th income percentile	Income =	\$60,179	Income =	\$40,570	Income =	\$74,109
	EFC =	8,999	EFC =	3,562	EFC =	13,881
Pell Grant		0		500		0
Subsidized Stafford Loan		2,625		2,625		2,625
Unsubsidized Stafford Loan		2,001		4,000		0
Chapter 30 GI benefit		9,306		0		0
Total aid		\$13,932		\$7,125		\$2,625

Sources: For Pell Grants and Stafford Loans, U.S. Department of Education. For Chapter 30 GI benefits, U.S. Department of Veterans Affairs.

Note: Average cost of attendance at a proprietary institution for the 2005 to 2006 academic year was \$22,931. The Department of Education calculated expected family contribution (EFC) using a weighted average of the EFC across students with different family characteristics within each student classification—veteran (always classified as independent), nonveteran independent, and nonveteran dependent. For each EFC/cost of attendance combination for each category of student the Department of Education determined the maximum Pell Grant and Stafford Loan amounts for a full-time, first-year student. Pell Grant amounts were determined according to the Pell Grant payment schedule for 2005 to 2006 (maximum award = \$4,050). The subsidized Stafford Loan amount is the lesser of (1) cost of attendance minus the sum of EFC plus Pell Grant or (2) the maximum subsidized loan for a first-year student (\$2,625). The unsubsidized Stafford Loan amount is the lesser of (1) cost of attendance minus the sum of Pell plus subsidized Stafford Loan plus other financial assistance (i.e.—GI Bill for veterans) or (2) the maximum additional unsubsidized loan for a first-year, independent student (\$4,000).

**Appendix III: Estimated Federal Title IV Aid
Awarded to Students**

^aUnsubsidized Stafford Loan amounts for nonveteran, independent students assume this population has no other financial assistance such as outside scholarships that may reduce the amount in unsubsidized loans for which this group may be eligible.

^bParents of dependent students have several credit options for financing their child's education, including home equity, private loans, and federal PLUS loans. PLUS loans are available under Title IV of the Higher Education Act and are loans made to parents of dependent, undergraduate students enrolled at least half-time in an eligible program of study. Borrowers are responsible for paying all interest on the loan. The maximum amount that a parent may borrow through a PLUS loan is equal to the student's cost of attendance minus all other assistance. Among dependent students who attended proprietary institutions in academic year 2003 to 2004, 20.3% received PLUS loans.

^cAmong students attending proprietary institutions, the Department of Education determined the 25th percentile, 50th percentile, and 75th percentile of family income in each student classification (veteran, nonveteran independent, and nonveteran dependent).

^dChapter 30 GI Bill benefit amount is based on academic year 2005 to 2006 rates of \$1,034 per month (Ch. 30 of Title 38 U.S.C.—Montgomery GI Bill Active Duty) for veterans who have completed an enlistment of 3 years or more and are attending school full-time for an academic year of 9 months.

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

In addition to the contact named above, Heather McCallum Hahn, Assistant Director; Linda L. Siegel; and Anthony Paras contributed significantly to all aspects of this report. Luann Moy assisted with methodology and data reliability, Alexander Galuten provided legal support, and Rachael C. Valliere assisted in report development.

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