



COMPTROLLER GENERAL OF THE UNITED STATES  
WASHINGTON, D.C. 20548

HRD-76-171

9-17-76

September 17, 1976

093669

B-178741

The Honorable Vance Hartke  
Chairman, Committee on Veterans' Affairs  
United States Senate

K Dear Mr. Chairman:

In your April 24, 1975, letter you requested that we determine whether the Veterans Administration (VA), State approving agencies, and participating schools were properly implementing certain provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, (Public Law 93-508)--specifically the 50 percent employment rule, the 85 percent enrollment rule, and the course character and advertising provisions.

We selected 13 schools for review--7 correspondence schools, 4 vocational/technical schools, and 2 flight schools. As you requested, we chose (1) correspondence schools which were the subject of our previous review of certain provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1972, (Public Law 92-540) 1/, (2) vocational/technical schools providing resident training, and (3) flight training schools. We selected these schools also because they had a variety of vocational courses and large veteran enrollment. We selected one course for review at each school. In general, these courses had a large veteran enrollment.

As discussed below and in the enclosure, we noted deficiencies in all provisions reviewed which limited VA's assurances that the act was being properly implemented. Since neither the 13 schools nor the 13 courses reviewed were statistically selected, the deficiencies noted cannot be considered representative of all courses affected by the act. However, because the deficiencies were due mostly to inadequate VA policy and guidelines the following may be common deficiencies:

- Some VA regional offices and State approving agencies did not process the schools' employment survey reports for the 50 percent rule as required.

1/Follow-up Work on Veterans Taking Correspondence Training (B-114859, June 5, 1974).

707517  
093669

HRD-76-171

They did not always (1) identify all schools and courses for which survey reports were required, (2) adhere to prescribed timeframes for processing reports, and (3) verify the mathematical accuracy of data on the reports. Also, the validity of several schools' surveys and their reporting was questionable.

--There was no clear definition of a VA subsidized student for purposes of computing the 85:15 ratio. Also, school officials were not certain whether it was their responsibility to make the ratio calculation and retain documentation to indicate their compliance with the rule.

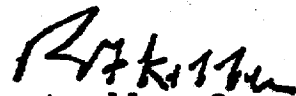
--VA had no acceptable standard for determining whether a course was avocational or recreational, and in fact, the survey form seemed to discourage veterans from indicating that a course they took was for personal enrichment, avocational or recreational reasons. Also, neither VA nor State agencies systematically reviewed school advertising.

During our review, we discussed our findings with VA officials and in some instances corrective action was taken. We are recommending additional actions in this report to provide further assurance that the four provisions of the act discussed above are effectively implemented.

As discussed with your office, formal comments were not obtained from VA. However, this report has been discussed with VA officials, and their comments have been included as appropriate.

Also, as discussed with your office, copies of the report are being sent to the Administrator of Veterans Affairs, other Congressional Committees, Members of Congress, and other interested parties.

Sincerely yours,

  
ACTING Comptroller General  
of the United States

Enclosure

RESULTS OF GAO REVIEW  
ON THE IMPLEMENTATION OF CERTAIN  
PROVISIONS OF THE VIETNAM ERA VETERANS'

READJUSTMENT ASSISTANCE ACT OF 1974 (PUBLIC LAW 93-508)

BACKGROUND

In the past, it was indicated that vocational schools were (1) catering primarily to VA subsidized students, (2) using false and misleading advertising to coax students to enroll, and (3) providing low quality instruction. Because of these indications, Public Law 93-508, December 3, 1974, provided that the VA Administrator shall not approve the enrollment of a veteran in any vocational course (1) unless it is shown that at least one-half of the graduates of that course have been employed in a field related to their training, (2) in which more than 85 percent of the students are having any part of their tuition subsidized by the VA or the school, (3) which is avocational or recreational in nature, or (4) offered by an institution that utilizes deceptive or misleading advertising. VA is responsible for implementing the act.

To determine whether VA was complying with the above provisions of the act, we made a review at the VA central office, Washington, D.C., and at 7 VA regional offices, 8 State approving agencies, and 13 schools in Florida, Georgia, Illinois, Indiana, Maryland, Ohio, and Washington, D.C. Seven of the schools were correspondence schools, four were resident vocational schools, and two were flight schools.

The 13 schools selected for review offered a wide range of courses with vocational training in electronics, computer technology, accounting, truck driving, barbering, air conditioning/refrigeration, hotel/motel management, automobile repair, and aircraft operation. We selected one course for review at each of the 13 schools. In general, each course had a large veteran enrollment.

At these sites we interviewed officials and reviewed policies, regulations, procedures, reports and records. Also, we telephoned a sample of the graduates from each school we visited to verify the accuracy of information on the students as reported by the schools.

THE 50 PERCENT EMPLOYMENT RULE

Sections 203(1) and 207(1) of the act (amending respectively, sections 1673(a)(2) and 1723(a)(2) of title 38 U.S.C.) provided:

The Administrator shall not approve the enrollment of an eligible person in any sales or sales management course which does not provide specialized training within a specific vocational field, or in any other course with a vocational objective, unless the eligible person or the institution offering such course "submits justification showing that at least one-half of the persons who completed such course over the preceding two-year period, and who are not unavailable for employment, have been employed in the occupational category for which the course was designed to provide training (but in computing the number of persons who completed such course over any such two-year period, there shall not be included the number of persons who completed such course with assistance under this title while serving on active duty)..." (The 50 percent employment rule)

VA is responsible for implementing the 50 percent employment rule; however, to do so it sought the help of State approving agencies and subject schools. The schools were to survey the graduates of each course during a 2-year period to gather employment information. Usually the graduates were furnished a VA-developed questionnaire (see appendix I) to complete and return to the school. The schools were required to summarize the responses for each course and report them to the appropriate State agency. (See appendix II).

The State approving agencies were to review the survey results submitted by the schools, approve or disapprove the courses, and forward the information to the appropriate VA regional office. VA contracted with the State agencies (generally a unit of the State Office of Education or a separate State training agency under contract with VA) to inspect, approve, and supervise schools and courses for training of eligible persons under the education program authorized by 38 U.S.C. 1651 et seq. (G.I. Bill). The regional offices were instructed by the Administrator to suspend enrollments in all non-complying courses.

Implementation of survey by regional  
offices and State agenciesRequirements

Regions received survey instructions from the VA central office for distribution to State agencies and schools by June 2, 1975. The regions were to maintain contact with the State agencies during the survey and the reporting stages to help resolve questions or problems. When a survey report for any course was delinquent or showed that the 50-percent requirement was not met, further enrollment of VA trainees in that course was not to be allowed by VA until the State agency certified that the 50 percent employment rule had been met.

Regions were responsible for reviewing the State agency and school records on a spot check basis to assure compliance with survey instructions. The State agencies were also responsible for reviewing all survey reports for mathematical accuracy and compliance with prescribed procedures.

Schools and courses requiring  
a survey not identified

In five of the seven areas that we reviewed, regional offices and their State approving agencies did not coordinate with each other to identify all schools and courses subject to the 50 percent employment survey requirements. Without this information they had no assurance that the affected schools conducted the survey for each of their courses.

As an example, one State agency was unable to identify all courses for which surveys were delinquent because it did not have a complete list of courses subject to the surveys. In processing surveys, the State agency used a directory of schools to account for survey reports received. When one or more reports were received from a school, State agency officials placed a check mark beside the school's name in the directory. The school names reported to the regional offices in December 1975 as having delinquent surveys were those believed to be subject to the 50 percent rule and not having a check mark recorded in the directory. This processing method was not a reliable check on schools with more than one course subject to a survey. In that case, if there was a check mark beside the school's name in

the directory, that school was considered to be in compliance even if it had not submitted all of its required surveys.

The regional office could not rely on the State's report since courses for which surveys were delinquent were not identified, and the region could not develop better data itself because it also did not have a complete listing of the courses.

Two regional offices' lists of schools and courses subject to the 50 percent employment rule did not agree with those of State agencies. For example, one regional office claimed to have 40 schools and 194 courses in its jurisdiction while the respective State agency claimed to have 36 schools and 180 courses.

In another case, a regional office provided us with a list of 426 schools subject to the 50 percent placement requirement. The State agency list had the names of 353 schools. Our review showed that there were schools on the region's list which were not on the State agency's list and vice versa. Another regional office could identify the schools and courses for vocational/technical, flight and correspondence institutions, however, it could not identify courses at institutions of higher learning that were subject to the requirement.

We also found that two VA regional offices sent employment survey instructions to all schools in their jurisdiction without regard to whether the schools were subject to the requirement.

When we discussed the problems cited above with VA central office officials, we suggested that the VA revise the survey instructions to require regional offices and State agencies to jointly identify schools and courses subject to the requirement. The officials agreed that such coordination was needed and revised the survey instructions accordingly.

#### Processing dates not adhered to

Va required that schools that were subject to the 50 percent rule survey their graduates and report the results to the appropriate State agency by July 1, 1975. However, if this was not possible, the schools could request an extension from the State agency to November 1, 1975. When a request for an extension or survey results was not received by July 1, 1975, the State agency was

to notify the VA regional office and new enrollments were to be suspended for the courses involved. State agencies and the VA were to take similar action if survey reports were not received by November 1, 1975. VA gave State agencies until December 1, 1975, to review the survey results submitted by the schools, approve or disapprove the courses, and forward the information to the regional offices. The regional offices were to take immediate action to suspend enrollments for courses which did not meet the criteria.

In four regions the processing dates were not adhered to. A blanket extension to November 1, 1975, was granted to all schools, State agencies did not forward the surveys to the VA by December 1, 1975, or the regional offices did not take immediate action when data was received to suspend enrollment in courses which did not meet the criteria.

In one region the State agency gave a blanket extension to all schools whether they requested it or not. Furthermore, it did not notify the regional office of the surveys that were delinquent until early December 1975. The extent is unclear to which the regional office contributed to or concurred with the blanket extension and with omitting the reporting of delinquent surveys at November 1, 1975. A State agency official told us that regional office officials actually suggested the blanket extension and were in agreement that the State agency did not have to report any overdue surveys until December 1, 1975, after their processing was completed. However, the official was unable to furnish documentation to this effect. VA regional office officials stated that they had been unable to prevent the State agency's actions because they had no real supervisory authority over the State agency. VA regional office officials told us that they were not informed until November that the backlog of work at the State agency had prevented any reporting until December 1975.

VA officials in another region told us that they were not notified of those schools which had neither submitted an employment survey by July 1, 1975, nor requested an extension to November 1, 1975. According to these officials, the regional office conducted a telephone survey of the schools in their jurisdiction in late July 1975, because (1) so few schools responded by July 1, 1975, (2) the State agency had a heavy workload, and (3) attendance was poor at the State agency's workshops where school responsibilities were discussed. The purpose of the telephone

survey was to remind the schools of their responsibilities under Public Law 93-508 and to ask them if they wanted an extension to November 1, 1975, to submit their employment survey. The regional officials said that the telephone survey resulted in their granting the blanket extension to all schools in their jurisdiction.

A third regional office, with the concurrence of the VA central office, granted an extension to all schools until November 1, 1975. The extension was granted because the State agency did not inform the region of those schools which failed to submit survey results or request an extension by July 1, 1975. The State agency did not report any surveys as delinquent because it assumed that all of the schools would request the extension. In addition, the State agency representative for vocational course accreditation retired July 1, 1975, and was not replaced until August 30, 1975.

At a fourth region, the State agency reported to the VA the schools that did not submit the survey results or request an extension by July 1, 1975. However, the State agency did not submit information on the remaining schools until January 14, 1976, because it was verifying all survey forms submitted by the schools. In addition, the regional office did not take action to suspend enrollments in any courses based on the information received on January 14, 1976, because the VA did not have a complete list of affected courses (as discussed on page 3). Instead, the regional office requested the State agency to provide a list of courses not meeting the 50 percent placement requirement. This list was received by the regional office on February 18, 1976.

Inadequate review of survey reports  
by State agencies

At each region visited we reviewed a sample of the survey reports submitted by the State agency for mathematical accuracy and compliance with survey instructions. At three regional offices we found few or no errors. However, at four regions we found numerous errors ranging from 20.8 percent to 45.7 percent. The number and type of errors indicated that no more than a marginal review of the reports was made by the State agencies prior to their submission to the regional offices.

For example, at one region we randomly selected 175 of the 1,229 survey reports and noted errors in 80 or 45.7 percent of these as follows:



--6 reports contained only mathematical errors.

--40 reports did not include graduates over a 2-year period as required. In 27 reports the survey period was omitted completely; in 9 reports the survey period exceeded 2 years; and in 4 reports the survey period was less than 2 years.

--6 reports contained only procedural errors by the State agency. In 5 cases it failed to approve or disapprove the course. In the other case, the State agency disapproved the course when it should have been approved.

--28 reports contained a combination of the errors described above.

We discussed with officials of State agencies the problems that they had in accomplishing their review of survey results. One official said he was not aware of the high error rates. He said he tried to check for mathematical accuracy and compliance with required survey procedures, but the processing of the employment surveys was an additional burden for which the agency was not authorized additional staff. He said that his staff was not familiar with compliance work and had to learn as they went.

Officials of other State agencies summarized the problems they had as follows:

--Not enough time. The July 1, 1975, deadline was unrealistic since the survey instructions were not distributed to the schools until June 1975.

--Not enough staff to administer the program and conduct an in-depth review of survey results. One agency had to hire additional clerical help.

### Implementation of survey at selected schools

#### Requirements

Schools were required to survey the graduates of each vocational course which was currently approved or for which approval was being sought under the provisions of the G.I. Bill. For each course, they were to identify those persons who had completed or had discontinued training during a designated 2-year period. From these, the schools were to eliminate those persons who discontinued or completed their training while in the armed forces. The remaining

graduates were to be in the survey unless the course had in excess of 300 graduates. If there were in excess of 300 graduates, a school had the option to select a random sample of 300. Schools were required to send out VA questionnaires to graduates unless the school could verify that it already maintained employment experience data on at least 75 percent of these people. The school used either the questionnaire responses or their own records to complete the survey reports for each applicable course.

Problems experienced by schools  
with survey instructions

At each of the 13 schools we made a detailed review of their compliance with the survey procedures. Each of the courses reviewed had been certified by a State agency as having met the 50 percent rule. Our review showed that survey results were questionable because several of these schools used invalid survey procedures.

Two schools did not survey all the appropriate people. For example, one school surveyed 51 people, and our review showed that 85 persons should have been surveyed. Another school surveyed 18 when 27 should have been surveyed.

One school used an incorrect basis for determining the survey population. It used the date students finished paying for their courses as the graduation date. As a result, some people who completed their courses as early as 1970, but who did not make their final payment until the survey period, were included in the survey. Conversely, some people who completed their courses and passed their final exam during the survey period were not surveyed because they had not fully paid for their courses during the period.

We also noted that schools classified questionnaire responses inconsistently. Some accepted student responses as presented, while others reclassified them. Some schools believed that the graduate was in the best position to judge whether his or her work was directly or closely related to training received, so they accepted the graduate's judgment without regard to conflicting information that might be on the questionnaire.

The educational director at another school informed us that he had personally reviewed and interpreted every graduate response received in the survey and had classified them based on his judgment of the overall theme of the

ENCLOSURE

ENCLOSURE

responses. The director said that although there were no VA instructions on the interpretation of responses, he believed that he had to reclassify some of them because many of the respondents' classifications did not seem reasonable.

We discussed the problems cited above with VA central office officials and suggested that the VA improve guidelines for classifying graduates and interpreting questionnaire responses. VA officials agreed and revised the instructions accordingly.

#### Conclusions

The 50 percent employment rule has not been properly implemented. Therefore, VA has not had information needed to determine whether vocational training courses have been of sufficient quality to warrant approval for veteran enrollment.

#### Recommendations to the VA Administrator

To help insure proper implementation of the 50 percent employment rule, we recommend that the Administrator urge the VA regional offices and State agencies to perform their assigned functions in processing school employment surveys including:

- processing the forms in a timely manner and
- reviewing the forms to detect errors and omissions in the surveys.

#### THE 85 PERCENT ENROLLMENT RULE

Section 203(3) of the act provides:

--"The Administrator shall not approve the enrollment of any eligible veteran, not already enrolled, in any course (other than one offered pursuant to subchapter V or subchapter VI of this chapter) which does not lead to a standard college degree and which is offered by a proprietary profit or proprietary nonprofit educational institution for any period during which the Administrator finds that more than 85 percentum

responses. The director said that although there were no VA instructions on the interpretation of responses, he believed that he had to reclassify some of them because many of the respondents' classifications did not seem reasonable.

We discussed the problems cited above with VA central office officials and suggested that the VA improve guidelines for classifying graduates and interpreting questionnaire responses. VA officials agreed and revised the instructions accordingly.

### Conclusions

The 50 percent employment rule has not been properly implemented. Therefore, VA has not had information needed to determine whether vocational training courses have been of sufficient quality to warrant approval for veteran enrollment.

### Recommendations to the VA Administrator

To help insure proper implementation of the 50 percent employment rule, we recommend that the Administrator urge the VA regional offices and State agencies to perform their assigned functions in processing school employment surveys including:

- processing the forms in a timely manner and
- reviewing the forms to detect errors and omissions in the surveys.

### THE 85 PERCENT ENROLLMENT RULE

Section 203(3) of the act provides:

--"The Administrator shall not approve the enrollment of any eligible veteran, not already enrolled, in any course (other than one offered pursuant to subchapter V or subchapter VI of this chapter) which does not lead to a standard college degree and which is offered by a proprietary profit or proprietary nonprofit educational institution for any period during which the Administrator finds that more than 85 percentum

of the students enrolled in the course are having all or part of their tuition, fees, or other charges paid to or for them by the educational institution or the Veterans' Administration..." (The 85 percent enrollment rule).

To implement the 85 percent enrollment rule VA required the affected schools to certify, when each new veteran enrolled, that the veteran/non-veteran ratio for that course was not in excess of 85:15. In addition, VA compliance surveys by regional offices determine whether the 85:15 ratio was being exceeded. State agencies have no responsibilities for implementing this rule.

Confusion over the definition of  
a VA subsidized student

None of the 13 courses we reviewed appeared to be in violation of the 85 percent enrollment rule. However, three schools had used what appeared to be questionable criteria in determining VA subsidized students for calculating the 85:15 percent ratio.

For example, one correspondence school defined a VA subsidized student as one for whom lessons had been certified to VA for payment. Veterans who were newly enrolled and had not yet had lessons certified to VA would be counted as non-subsidized under the school's definition. School officials told us that a lag of up to 4 months could occur before a newly enrolled veteran would have lessons certified to VA and be counted as a VA subsidized student. The school's definition of a VA subsidized student was based on its interpretation of the description of such students in Public Law 93-508 as "having all or part of their tuition, fees, or other charges paid to or for them by the educational institution or the Veterans' Administration..." School officials believed that until the school had certified one or more lessons to VA for payment, the student had not actually had anything "paid" by the VA, and there was no assurance that he ever would.

Another correspondence school classified students as VA subsidized only during the period that they received VA benefits. Students with only enough VA eligibility to cover part of their tuition were counted as being VA subsidized only as long as they received VA benefits. When such benefits were exhausted, they were counted as non-VA subsidized for computing the 85:15 ratio.

The school also considered students who have completed a course and received VA benefits for the full tuition as currently enrolled non-veterans if they had not yet paid all of their tuition to the school.

For flight schools, VA requires a daily flight record be maintained, which clearly shows the number of hours of flight instruction or the charges for the instruction given to VA and non-VA students. A flight school cannot enroll a veteran if the total hours of veteran instruction or charges in approved courses during the 30 day period immediately preceding the date the veteran enrolls exceeded 85 percent of the total hours or charges for all students for that course.

At one flight school the hours flown were recorded on the log either as part VA subsidized and part non-VA subsidized, depending upon how the students indicated they planned to pay--whether they would certify the hours to VA for payment or pay for the flight instruction on their own.

We discussed the above situations with VA central office officials, and as a result, VA's office of general counsel is presently working on a definition of a VA subsidized student to be used in calculating the 85:15 ratio.

#### Need to clarify schools' responsibilities regarding calculations of ratio

Four schools had not, each time new veterans were enrolled, calculated their course enrollment to assure compliance with the 85 percent enrollment rule. Officials of all four schools told us that they were aware that they were certifying compliance with the rule without making the calculation, nonetheless, they were sure their courses met the requirement and did not consider it necessary to calculate and document the ratio. VA officials told us that there is no current requirement for schools to document the ratio calculation.

#### Conclusions

VA has not properly implemented the 85 percent enrollment rule because it has not fully defined (1) a VA subsidized student or (2) a school's responsibilities in calculating the 85:15 ratio and retaining documentation to support its compliance with that rule.

Recommendations to the VA Administrator

To help insure adequate implementation of the 85 percent enrollment rule, we recommend that the Administrator define:

- a VA subsidized student for purposes of calculating the ratio of veterans to non-veterans.
- a school's responsibility for making the ratio calculations and documenting their compliance with the rule.

COURSE CHARACTER AND ADVERTISING PROVISIONS

Sections 203(2) and 207(2) of the act amended 38 U.S.C. sections 1673 (a)(3) and 1723 (a)(3) to provide that the Administrator shall not approve the enrollment of an eligible person in any type of course which the Administrator determines to be avocational or recreational in nature or the advertising for which he believes contains significant avocational or recreational themes. This type of course will be approved only if the eligible person submits justification that the course will be of bona-fide use in the pursuit of his present or contemplated business or occupation. (The course character provision).

In addition Section 212 (a) of the act provides:

- "The Administrator shall not approve the enrollment of an eligible veteran or eligible person in any course offered by an institution which utilizes advertising, sales, or enrollment practices of any type which are erroneous, deceptive, or misleading either by actual statement, omission, or intimation." (The advertising provision).

Implementation of the course character and advertising provisionsRequirements

On the survey form (see appendix I) graduates indicating they were unavailable for employment were asked why. One of the possible answers was "I took the course for personal enrichment, avocational, or recreational purposes only (not under the G.I. Bill)." According to survey instructions, if VA feels that a significant number of

respondents gave this answer, VA was to contact the school, and the school was to prove that the course was not avocational or recreational.

To implement the advertising provisions VA entered into a formal agreement with the Federal Trade Commission (FTC). Under certain circumstances VA was to refer advertising material to the FTC which was considered erroneous, deceptive, or misleading. The FTC was to conduct an investigation, when necessary, and decide whether the advertising, sales, and enrollment practices in question were actually erroneous, deceptive, or misleading.

VA's determination of whether a course  
is avocational or recreational

We reviewed the employment survey forms for each of the 13 courses and noted that in one course, 177 of the 364 questionnaire respondents stated they took the course for personal enrichment, avocational, or recreational reasons. As of September 1976, 8 months after the survey report was received, the regional office had taken no action to require the school to prove the course was not avocational or recreational. When we telephoned a sample of graduates from the course to verify their responses, we found an additional 19 graduates from a sample of 44 who had initially responded in another questionnaire category, who took the course for personal enrichment, avocational, or recreational reasons. Thus, over half of the graduates took the course for such reasons.

In our opinion, the phrase, "not under the G.I. Bill" cautions recipients of G.I. Bill benefits to choose one of the other responses on the questionnaire. This in turn will understate the personal enrichment, avocational or recreational response and overstate other responses.

We discussed our observations with VA central office officials who said that the VA had no established standard for determining whether a course is avocational or recreational. We suggested that it establish a standard. VA revised its instructions so that if 50 percent of the persons surveyed indicate on the questionnaire that they took the course for avocational or recreational purposes, the school would be required to prove that the course was not avocational or recreational in nature. We did not agree with this revision and believe that VA should consider the number of questionnaire respondents rather than the number of persons surveyed. VA officials agreed to



reconsider their criterion for judging when a course should be considered avocational or recreational.

We also discussed with VA our opinion that the phrase "Not under the G.I. Bill" encourages veterans to respond in a category other than "Personal Enrichment, Avocational, or Recreational." In accordance with our suggestion, VA revised the form to omit the parenthetical expression.

Avocational and recreational themes  
in advertising

At each of the 13 schools visited, we verified the accuracy of advertising claims regarding:

- the size or experience of the school,
- the school's affiliation with well-known companies or training programs,
- the availability of expert instructors, guest lecturers, or teaching aids,
- availability of school placement services,
- employment opportunities or expected earnings, and
- success of former students in finding related employment.

We also reviewed all advertising material for avocational or recreational themes. Of the 13 courses, we noted only one that had avocational and recreational themes in some of its advertising.

This advertising had the following phrases--

"why pay repair bills, when you can learn to fix your own car at home, in your spare time" and "30 lesson tune-up course is a basic repair course that will save you a lot on your car upkeep."

We discussed with the school and VA central office officials the advertisements containing avocational and recreational themes, and the school officials agreed to change the advertisements. VA officials said they were aware of the particular school and course advertisements and were taking steps to have them corrected.

Need for systematic review  
of school advertising

Regional and State agency officials said they would object to misleading claims or significant avocational or recreational themes which they identified while reviewing advertising. However, neither regional nor State agency officials had a continuing program to collect and review schools' advertising. They said that, in general, action was taken when the regional office or the State agency received complaints from students about advertising or they otherwise became aware of questionable advertising matter.

VA central office officials recognized that this was a problem, but they told us that they had no plans to correct it.

Conclusions

We believe that VA has not adequately implemented the course character and advertising provisions. This belief is supported by the following:

- VA had no standard to determine what percentage of responses indicated that a course was avocational or recreational. As a result of our review, survey instructions were revised to indicate that the nature of a course was personal enrichment, avocational, or recreational when 50 percent or more of the persons to be surveyed indicated that they took the course for one of those reasons. We do not agree with this revision. It would be more meaningful to base a percentage on the number of persons responding to the questionnaire. Also, we believe that 50 percent may be too high a standard.
- VA did not have a system to collect, review, and analyze advertising material, so it could not adequately identify which advertising should be referred to the FTC.

Recommendations to the VA Administrator

To help insure adequate implementation of the course character and advertising provisions of the act, we recommend that the Administrator:

- Determine whether (1) a course is avocational or recreational on the basis of the number of questionnaire respondents rather than on the number of persons surveyed and (2) a lower percentage for the standard is more reasonable.
- Establish procedures to systematically collect, review, and analyze advertising material to facilitate monitoring of school advertising.

Form Approved  
OMB No. 76-R0688

<b>OCCUPATIONAL GRADUATE EMPLOYMENT QUESTIONNAIRE</b>		REPORTS CONTROL SYMBOL 25-12
<b>IMPORTANT-Read instructions on reverse carefully before completing this questionnaire.</b>		
1. WERE YOU ON ACTIVE DUTY IN THE ARMED FORCES OF THE U.S. WHEN YOU COMPLETED THIS COURSE?		
<input type="checkbox"/> YES (If "YES," no further questions need to be answered) <input type="checkbox"/> NO (If "NO," continue to question 2A)		
2A. SINCE COMPLETING THIS COURSE OF TRAINING, HAVE YOU WORKED IN AN OCCUPATION DIRECTLY RELATED TO THIS TRAINING?		
<input type="checkbox"/> YES (If "YES," complete Items 2B and 2C and then skip to Item 6A) <input type="checkbox"/> NO (If "NO," continue to question 3A)		
2B. OCCUPATION AND MOST IMPORTANT DUTIES OR ACTIVITIES	2C. NAME AND ADDRESS OF THAT EMPLOYER	
3A. SINCE COMPLETING THIS COURSE OF TRAINING HAVE YOU WORKED IN A CLOSELY RELATED JOB, COMPARABLE IN LEVEL TO THE TYPE OF WORK FOR WHICH THIS COURSE PROVIDED TRAINING? (Answer "yes" only if the skills you have used from this course are essential for satisfactory performance of the "closely related" job.)		
<input type="checkbox"/> YES (If "YES," complete Items 3B and 3C and skip to Item 6A) <input type="checkbox"/> NO (If "NO," continue to question 4A)		
3B. OCCUPATION AND MOST IMPORTANT DUTIES OR ACTIVITIES	3C. NAME AND ADDRESS OF THAT EMPLOYER	
4A. SINCE YOU ANSWERED "NO" TO QUESTIONS 2A AND 3A, ABOVE, HAVE YOU BEEN AVAILABLE FOR EMPLOYMENT IN THE TYPE OF WORK FOR WHICH THIS COURSE PROVIDED TRAINING?		
<input type="checkbox"/> YES (If "YES," skip to Item 6A) <input type="checkbox"/> NO (If "NO," complete Item 4B)		
4B. CHECK THE BOX BELOW WHICH BEST EXPLAINS WHY YOU HAVE NOT BEEN AVAILABLE FOR EMPLOYMENT IN THIS TYPE OF WORK		
<div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <input type="checkbox"/> I BECAME DISABLED AND CANNOT DO THIS TYPE OF WORK  <input type="checkbox"/> I BECAME PREGNANT, CAUSING ME TO FOREGO A NEW CAREER  <input type="checkbox"/> I WAS UNWILLING TO MOVE TO A NEW LOCALITY TO TAKE AN AVAILABLE JOB             </div> <div style="width: 30%;"> <input type="checkbox"/> I HAVE CONTINUED MY SCHOOLING  <input type="checkbox"/> MY MARITAL STATUS CHANGED, CAUSING ME TO FOREGO A NEW CAREER  <input type="checkbox"/> OTHER REASONS (Explain)             </div> <div style="width: 30%;"> <input type="checkbox"/> I TOOK THE COURSE FOR PERSONAL ENRICHMENT, A VOCATIONAL, OR RECREATIONAL PURPOSES ONLY (Not under the G.I. Bill)             </div> </div>		
5. REMARKS		
6A. SIGNATURE OF GRADUATE	6B. DATE SIGNED	6C. GIVE TELEPHONE NUMBER WHERE YOU CAN BE REACHED
THIS IS THE END OF THE QUESTIONNAIRE. THANK YOU FOR YOUR COOPERATION. PLEASE RETURN THE COMPLETED QUESTIONNAIRE IN THE ENCLOSED, PRE-ADDRESSED ENVELOPE. PLEASE MAIL IT TODAY.		
TO BE COMPLETED BY SCHOOL		
DATA PROVIDED BY:		
<input type="checkbox"/> QUESTIONNAIRE <input type="checkbox"/> INTERVIEW <input type="checkbox"/> SCHOOL RECORDS		
DATA AUTHENTICATED BY: (Signature and Title of school official)		DATE

VA FORM 22-8722  
MAY 1975

VETERANS ADMINISTRATION			Form Approved OMB No. 75-70688
OCCUPATIONAL GRADUATE EMPLOYMENT REPORT (Schools)			REPORTS CONTROL SYMBOL 22-12
IMPORTANT—Read instructions on reverse carefully before completing this Form.			
NAME AND ADDRESS OF SCHOOL		NAME OF COURSE (Program)	
PERIOD COVERING PERSONS COMPLETING OR DISCONTINUING TRAINING			FOR VA USE ONLY
TO			
LINE NO.	DESCRIPTION	ENTRY	CARD COL.
1	PERSONS WHO COMPLETED OR DISCONTINUED TRAINING		
2	PERSONS ON ACTIVE DUTY IN THE ARMED FORCES OF THE U.S.		
3	REMAINDER (Line 1 minus Line 2)		1-4
4	NUMBER WHO DID NOT COMPLETE COURSE		5-8
5	REMAINDER (Line 3 minus Line 4)		
6	PERSONS TO BE SURVEYED (If Line 5 is 300 or less, use Line 5. If Line 5 is greater than 300, sampling may be used.)		9-11
7	UNABLE TO CONTACT		12-14
8	PERSONS CONTACTED (Line 6-line 7)		
9	NO RESPONSE (Including refusals)		
10	TOTAL RESPONDENTS (Line 8-line 9)		15-17
11	MINIMUM ACCEPTABLE RESPONSE FOR PERSONS CONTACTED (Line 8 x .55) (Round to nearest whole number)		
12	RESPONSE BASE ADJUSTED FOR RESPONSE RATE (Enter number from line 10 or line 11, whichever is greater)		18-20
13	EXCLUDED RESPONSES - TOTAL		21-22
	A. DISABLED		23-24
	B. IN TRAINING		25-26
	C. PERSONAL ENRICHMENT, AVOCATIONAL, OR RECREATIONAL (Not under G.I. Bill)		27-28
	D. PREGNANT		29-30
	E. CHANGE IN MARITAL STATUS (cannot start new career)		31-32
	F. UNWILLING TO MOVE TO NEW LOCALITY		33-34
	G. OTHER VALID REASONS		35-36
14	PERCENT OF RESPONSES USED (Line 10-Line 13; divided by Line 10) (Round to nearest tenth of percent)		
15	RESPONSE BASE FURTHER ADJUSTED FOR EXCLUSIONS (Line 12 x Line 14) (Divided by 100) (Round to nearest whole number)		37-39
16	EMPLOYED IN TYPE OF WORK FOR WHICH TRAINED		40-42
17	EMPLOYED IN A CLOSELY RELATED TYPE OF WORK WHICH REQUIRES SUBSTANTIAL USAGE OF SKILLS LEARNED IN THIS COURSE		43-45
18	PERCENT EMPLOYED IN THE SAME TYPE OF WORK (Line 16 divided by Line 15) (Round to nearest tenth of a percent)		
19	PERCENT EMPLOYED IN THE SAME OR A CLOSELY RELATED TYPE OF WORK (Line 16+Line 17; divided by Line 15) (Round to nearest tenth of a percent)		
SIGNATURE AND TITLE OF SCHOOL OFFICIAL		DATE	
CERTIFICATION BY STATE APPROVING AGENCY - This report has been checked and we find that it <input type="checkbox"/> Does; <input type="checkbox"/> Does Not support at least a 50 percent employment level in the same or a closely related type of work for which trained.			
SIGNATURE AND TITLE OF CERTIFYING OFFICIAL		DATE	
FOR VA USE ONLY	COURSE CODE (CC 46-48)	FACILITY CODE (CC 49-55)	RD NUMBER (CC 56-57)

VA FORM 22-8723  
MAY 1975