



January 2024

HIGHER EDUCATION

VA Should Provide Additional Information to Its Staff and Schools on the Rogers STEM Scholarship

Accessible Version

Why GAO Did This Study

Veterans who received technical training in the military may be well suited to pursue degrees in STEM. The Edith Nourse Rogers STEM Scholarship provides up to \$30,000 to assist veterans with continuing qualifying STEM programs after they exhaust their Post-9/11 GI Bill benefits.

The Harry W. Colmery Veterans Educational Assistance Act of 2017 includes a provision for GAO to provide an interim and final assessment of the Rogers STEM scholarship program. This final assessment (1) reports the number of veterans that pursued and obtained STEM degrees using the Rogers STEM scholarship, and (2) evaluates how consistently VA processes Rogers STEM scholarship applications. GAO analyzed VA administrative data from August 2019 to June 2023, the most recently available data at the time of GAO's analysis. GAO also held four discussion groups with VA staff who process scholarship applications and reviewed relevant VA documents.

What GAO Recommends

GAO is making four recommendations to VA, including developing additional information to aid VA staff who review scholarship applications and improving the information available to school officials. VA concurred with GAO's recommendations.

HIGHER EDUCATION

VA Should Provide Additional Information to Its Staff and Schools on the Rogers STEM Scholarship

What GAO Found

More than 7,000 veterans have used the Edith Nourse Rogers STEM Scholarship since the program began in August 2019. The scholarship provides financial assistance to eligible veterans pursuing degrees in science, technology, engineering, and mathematics (STEM). The vast majority of veterans (99 percent) used the scholarship towards an undergraduate STEM degree, and about 2,000 veterans graduated while using the scholarship.

GAO found that the Department of Veterans Affairs has tools—such as staff training and guidance—to help ensure consistent Rogers STEM scholarship application processing, and more information for its staff and schools would bolster these efforts. Some STEM majors are easy to identify (e.g., engineering or mathematics). VA staff judgement becomes part of the application award process in the small number of applications where a veteran's major is not easily identifiable as STEM.

Using VA data, GAO identified more than 100 instances where VA potentially made erroneous scholarship award decisions because the major approved for the scholarship did not appear to be STEM. VA confirmed that in 56 instances it appeared the agency approved scholarships for veterans pursuing ineligible majors, such as applied management and construction management. These 56 instances reflect VA's approval of up to \$1.7 million in scholarship funds for veterans to use toward majors not in STEM fields.

Through data analysis, review of VA documents, and interviews with VA staff, GAO identified two areas where VA could provide additional information to help ensure consistent scholarship award decisions. Specifically:

- **Information for VA staff.** VA does not have a complete list of eligible majors for its staff to use when processing applications and deciding whether to award the scholarship. VA also does not have formal procedures to ensure its staff raise questions or further examine applications with majors that appear to be non-STEM.
- **Information for schools.** School officials provide key information during the application process, however, the resources that VA provides to schools do not fully describe the school's role. As a result, schools do not always provide the information needed and VA may deny the scholarship to an otherwise eligible veteran, according to VA staff.

Providing this additional information to VA staff and schools can help ensure consistent scholarship award decisions.

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Abbreviations

B&B	Baccalaureate and Beyond Longitudinal Study
CIP	Classification of Instructional Programs
DGI	Digital GI Bill
Post-9/11 GI Bill	Post-9/11 Veterans Educational Assistance Act of 2008
Rogers STEM scholarship	Edith Nurse Rogers STEM Scholarship
STEM	science, technology, engineering, and mathematics
VA	Department of Veterans Affairs

VCE

veterans claims examiner

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January 17, 2024

The Honorable Jon Tester
Chairman
The Honorable Jerry Moran
Ranking Member
Committee on Veterans' Affairs
United States Senate

The Honorable Mike Bost
Chairman
The Honorable Mark Takano
Ranking Member
Committee on Veterans' Affairs
House of Representatives

Research has shown that degrees in science, technology, engineering, and mathematics (STEM) fields generally provide higher starting salaries, greater job security, and higher growth in earnings than non-STEM fields.¹ Therefore, STEM degrees may support a positive transition to civilian life for veterans, particularly those who developed expertise in STEM fields during their time in the military. Eligible veterans may use Post-9/11 GI Bill benefits to pursue STEM degrees.² These benefits may cover up to 4 years of college.

As we reported in 2022, some veterans need more than 4 years to complete their STEM undergraduate degrees.³ For example, we found that veterans may need remedial courses before starting coursework

¹Anthony P. Carnevale, Ban Cheah, and Andrew R. Hanson. *The Economic Value of College Majors*, (Washington, D.C.: Georgetown University Center on Education and the Workforce, 2015). For this report, we use VA's definition of STEM developed for the Edith Nourse Rogers STEM Scholarship. This definition includes majors in biological or biomedical science, physical science, science technologies, computer and information science, mathematics, statistics, engineering and related technologies, health professions, agriculture science, and natural resources science.

²The Post-9/11 GI Bill program was established by the Post-9/11 Veterans Educational Assistance Act of 2008. Pub. L. No. 110-252, tit. V, 122 Stat. 2323, 2357.

³GAO, *Higher Education: VA Could Improve Support for Veterans Pursuing STEM Majors*, [GAO-22-105326](#) (Washington, D.C.: Sept. 29, 2022). The challenges veterans faced when completing STEM majors that were included in our 2022 report were not necessarily unique to veterans.

specific to their chosen STEM degree. Such additional coursework can cause veterans to exhaust their Post-9/11 GI Bill benefits before completing their degrees.

The Edith Nourse Rogers STEM Scholarship provides up to \$30,000 to assist veterans with continuing qualifying STEM programs after they exhaust their Post-9/11 GI Bill benefits. Our 2022 report found that over 3,500 veterans used the scholarship from August 1, 2019 (the start of the program) to July 31, 2021. We also found that the Department of Veterans Affairs could better communicate with veterans regarding the scholarship and could collect and use scholarship-related data more effectively.⁴ We made five recommendations to improve the clarity of VA communications to scholarship applicants, among other recommendations. VA agreed with the recommendations, and as of August 2023, has implemented three of them.

The Harry W. Colmery Veterans Educational Assistance Act of 2017 includes a provision for us to provide an interim and final assessment of the Rogers STEM scholarship program. This final assessment (1) reports the number of veterans that pursued and obtained STEM degrees using the Rogers STEM scholarship, and (2) evaluates how consistently VA processes Rogers STEM scholarship applications.⁵

To report how many veterans used the scholarship and obtained STEM degrees, we analyzed VA administrative data for all scholarship recipients from the start of the program in August 2019 to June 2023, the most recently available data at the time of our analysis.⁶ The administrative data included individual-level records for each veteran who applied for or used these benefits. We analyzed the data to determine the number of veterans who applied for or used these benefits, as well as their related characteristics, such as college major and age. We also determined the

⁴[GAO-22-105326](#).

⁵The act also includes provisions for us to provide an assessment of the extent to which colleges made changes to STEM degrees or programs of education offered by the college since August 2017; and the job placement rate, median annual earnings, and length of employment for scholarship recipients. See appendix I and appendix II for information related to those provisions.

⁶Non-veterans, such as surviving children or spouses of a military member who dies in the line of duty, may be eligible for the scholarship under limited circumstances. Given that very few non-veterans receive the scholarship compared to veterans, we generally refer to all recipients and applicants as veterans.

number of veterans who obtained a STEM degree while receiving scholarship benefits.

To evaluate how consistently VA processes Rogers STEM scholarship applications, we analyzed this same VA administrative data to examine the application award process. We took steps to confirm the reliability of the VA administrative data, including reviewing documentation and testing the data for irregularities and missing data. We also interviewed knowledgeable VA officials to understand irregularities in the data. We determined the VA administrative data were sufficiently reliable for the purposes of reporting the number and characteristics of veterans enrolled in STEM programs using the Rogers STEM scholarship and evaluating the consistency of the application process.

In addition, we reviewed processing guides and other resources used by the scholarship processing team. We also held four discussion groups with 12 of 13 veterans claims examiners (VCE) who process the applications and interviewed other relevant VA officials.⁷ Through the data analysis, document review, and interviews, we determined that an internal control principle related to externally communicating quality information was significant to this objective. We assessed the extent to which VA externally communicated relevant information pertaining to the scholarship.⁸ We also compared VA's application processing efforts to the goals and objectives in VA's 2022-2028 strategic plan. For more information on selected methodologies, see appendix III.

We conducted this performance audit from January 2023 to January 2024 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

⁷One claims examiner was not available when we spoke with the other claims examiners.

⁸GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014). Principle 15.

Background

The Rogers STEM scholarship provides benefits to eligible veterans enrolled in a qualifying program (see table 1). The scholarship provides up to 9 months of benefits, not to exceed \$30,000.⁹

Table 1: Key Eligibility Criteria for the Edith Nourse Rogers STEM Scholarship

Eligibility categories	Criteria
General eligibility	Applicants must have qualified for Post-9/11 GI Bill educational benefits; and
General eligibility	applicants must have exhausted their Post-9/11 GI Bill educational benefits, or be on track to exhaust their Post-9/11 GI Bill educational benefits within 6 months of applying for the scholarship. ^a
Qualifying educational programs ^b	Applicants must be enrolled in an undergraduate STEM degree program or a qualifying dual degree program and have completed at least 60 credits for a degree that requires at least 120 semester credit hours, or 90 credits for a degree that requires at least 180 quarter credit hours; or
Qualifying educational programs ^b	applicants must have earned a postsecondary degree or a graduate degree in an approved STEM degree field and be enrolled in a covered clinical training program for health care professionals; or
Qualifying educational programs ^b	applicants must have earned a postsecondary degree in an approved STEM degree field and be enrolled in a program of education leading to a teaching certification.

Source: GAO analysis of Department of Veterans Affairs' documents and website. | GAO-24-106492

Notes: While applicants may meet all eligibility criteria, their receipt of the scholarship is also subject to the availability of funding. STEM is an abbreviation for science, technology, engineering, and mathematics.

^aUnder 38 U.S.C. § 3320(b)(2), veterans are eligible if they are on track to exhaust their Post-9/11 GI Bill benefits within 180 days of applying for the scholarship.

^bAccording to VA, while 38 U.S.C § 3320(b)(4)(A) authorizes use of the scholarship for dual undergraduate degree programs, it does not authorize its use for dual undergraduate and graduate degree programs. The Rogers STEM scholarship does not pay for enrollment in a graduate degree program; however, individuals who completed a graduate degree in an approved STEM field, and then enroll in a covered clinical training program for health care professionals may be eligible for the scholarship.

To develop the list of education programs (i.e., majors) eligible for the scholarship, VA used Classification of Instructional Programs (CIP) codes and names of majors from the Department of Education CIP code

⁹38 U.S.C. § 3320(d)(1).

system.¹⁰ CIP codes are a numerical way to classify majors to support accurate tracking and reporting.¹¹ VA's list identifies majors, and their corresponding CIP codes, that VA considers eligible for the scholarship.¹² See figure 1 for examples of majors eligible for the scholarship and their CIP codes.

¹⁰The scholarship may be used for education programs such as clinical training programs, teaching certification programs, and undergraduate STEM degree programs. Given that the vast majority of scholarship recipients use the scholarship toward an undergraduate degree, we refer to these education programs as "majors."

¹¹CIP codes label various fields using a 2-digit, 4-digit, and 6-digit number, with fields getting more specific with the increasing number of digits. The CIP code system is comprised of 48 2-digit categories, and hundreds of 6-digit fields of study to cover the nuances and slight differences between various fields.

¹²The Department of Education developed the CIP code system for purposes unrelated to the Rogers STEM scholarship. VA uses the system to help identify STEM majors across schools and varying program names, according to VA officials.

Figure 1: Examples of Majors Eligible for Department of Veteran Affairs' Edith Nourse Rogers STEM Scholarship and Their Corresponding Classification of Instructional Programs (CIP) Code

STEM Designated Degree Program List Effective January 1, 2020		
CIP code category	2, 4, or 6 digit CIP code	CIP code major
27	27	MATHEMATICS AND STATISTICS.
27	27.01	Mathematics.
27	27.0101	Mathematics, General.
27	27.0102	Algebra and Number Theory.
27	27.0103	Analysis and Functional Analysis.
27	27.0104	Geometry/Geometric Analysis.
27	27.0105	Topology and Foundations.
27	27.0199	Mathematics, Other.
27	27.03	Applied Mathematics.
27	27.0301	Applied Mathematics, General.
27	27.0303	Computational Mathematics.
27	27.0304	Computational and Applied Mathematics.
27	27.0305	Financial Mathematics.
27	27.0306	Mathematical Biology.
27	27.0399	Applied Mathematics, Other.
27	27.05	Statistics.
27	27.0501	Statistics, General.
27	27.0502	Mathematical Statistics and Probability.
27	27.0503	Mathematics and Statistics.
27	27.0599	Statistics, Other.

CIP= Classification of Instructional Programs
 STEM = science, technology, engineering, and mathematics

Source: Department of Veterans Affairs STEM Designated Degree Program List. | GAO-24-106492

Accessible Data for Figure 1: Examples of Majors Eligible for Department of Veteran Affairs' Edith Nourse Rogers STEM Scholarship and Their Corresponding Classification of Instructional Programs (CIP) Code

STEM Designated Degree Program List Effective January 1, 2020

(CIP= Classification of Instructional Programs; STEM = science, technology, engineering, and mathematics)

CIP code category	2, 4, or 6 digit CIP code	CIP code major
27	27	MATHEMATICS AND STATISTICS
27	27.01	Mathematics, General
27	27.0102	Algebra and Number Theory
27	27.0103	Analysis and Functional Analysis
27	27.0104	Geometry/Geometric Analysis

CIP code category	2, 4, or 6 digit CIP code	CIP code major
27	27.0105	Topology and Foundations
27	27.0199	Mathematics, Other
27	27.03	Applied Mathematics
27	27.0301	Applied Mathematics, General
27	27.0303	Computational Mathematics
27	27.0304	Computational and Applied Mathematics
27	27.0305	Financial Mathematics
27	27.0306	Mathematics Biology
27	27.0399	Applied Mathematics, Other
27	27.05	Statistics
27	27.0501	Statistics, General
27	27.0502	Mathematical Statistics and Probability
27	27.0503	Mathematical and Statistics
27	27.0599	Statistics, Other

Source: Department of Veterans Affairs STEM Designated Degree Program List. | GAO-24-106492

More Than Seven Thousand Veterans Have Used the Rogers STEM Scholarship since 2019

According to our analysis of VA data, from August 2019 to June 2023, 7,472 veterans used the Rogers STEM scholarship. This comprises 64 percent of the 11,659 veterans awarded the scholarship.¹³ Since August 2019, 2,056 veterans have graduated while receiving the scholarship.¹⁴ In addition, 3,483 veterans had funds available for use as of June 2023.

The vast majority of veterans (99 percent) used the scholarship towards an undergraduate STEM degree. Among these veterans, the average age was 34. The top three majors for these veterans were (1) computer and information sciences and support services, (2) health professions and related clinical sciences, and (3) engineering (see table 2). One-half of veteran scholarship recipients attended public schools. One-quarter of

¹³According to VA administrative data, VA processed over 30,000 applications from August 2019 to June 2023.

¹⁴The total number of graduates may be higher. VA does not collect graduation status for veterans unless they are receiving the scholarship at the time of graduation.

veterans attended private nonprofit schools and the remaining quarter of veterans attended private for-profit schools.

Table 2: Number of Veterans Who Have Used VA’s Edith Nourse Rogers STEM Scholarship Funding by Major or Program, as of June 2023

Major or program	Number of Veterans
Computer and information sciences and support services	2,325
Health professions and related clinical sciences	1,501
Engineering	1,307
Other ^a	741
Biological and biomedical sciences	496
Engineering technologies/technicians	466
Natural resources and conservation	191
Physical sciences	180
Mathematics and statistics	103
Agriculture, agriculture operations, and related sciences	67
Science technologies/technicians	12
Sub-total of veterans who have used Rogers STEM scholarship funding for an undergraduate degree^b	7,389
Clinical training program	61
Teaching certification program	22
Total number of veterans who have used Rogers STEM scholarship funding	7,472

Source: GAO analysis of Department of Veterans Affairs administrative data | GAO-24-106492

^aOther includes veterans who pursued majors VA categorized as “other,” such as air science and digital communication, veterans in dual-degree programs, and veterans who could not be categorized with the information available in VA’s data.

^bSTEM is an abbreviation for science, technology, engineering, and mathematics.

VA Provides Training and Guidance to Support Application Processing, but Insufficient

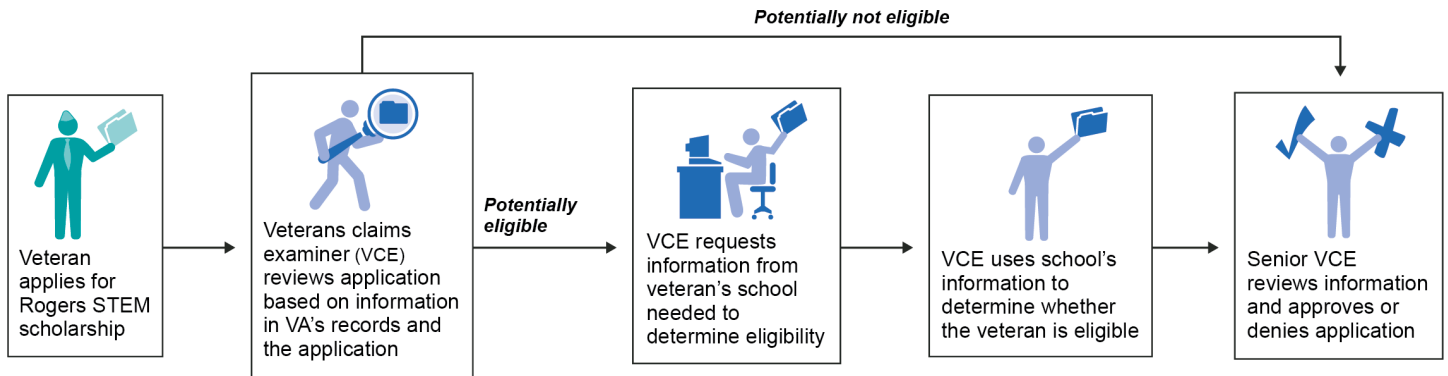
Resources for Schools and Claims Examiners Can Lead to Inconsistencies

VA Provides Claims Examiners with Ongoing Training and Detailed Guidance

VA officials process thousands of scholarship applications using multiple reviewers, training, and guidance, according to VA officials and documents. Specifically:

Multiple reviewers. Generally, at least two officials—a veterans claims examiner (VCE) and a senior VCE—within the Rogers STEM scholarship team review an application before VA sends an award decision to a veteran (see fig.2).

Figure 2: General Application and Approval Process for VA’s Edith Nourse Rogers STEM Scholarship



STEM = science, technology, engineering, and mathematics

Source: GAO analysis of Department of Veterans Affairs (VA) documentation and interviews with VA officials; GAO (icons). | GAO-24-106492

Accessible Text for Figure 2: General Application and Approval Process for VA’s Edith Nourse Rogers STEM Scholarship

(STEM = science, technology, engineering, and mathematics)

1. Veteran applies for Rogers STEM scholarship
2. Veterans claims examiner (VCE) reviews application based on information in VA’s records and the application
3. If veteran is potentially eligible, VCE requests information from veteran’s school needed to determine eligibility
 - a. If veteran is potentially not eligible, Senior VCE reviews information and approves or denies application

4. VCE uses school's information to determine whether the veteran is eligible
5. Senior VCE reviews information and approves or denies application

Source: GAO analysis of Department of Veterans Affairs (VA) documentation and interviews with VA officials; GAO (icons). | GAO-24-106492

According to VA officials and documents, after a veteran applies for the scholarship, the VCE is to review the application and determine whether the veteran is potentially eligible for the scholarship. If the veteran is potentially eligible, the VCE is to contact a school certifying official at the veteran's school to collect additional information needed to determine the veteran's eligibility, such as the veteran's earned credit hours and major.¹⁵

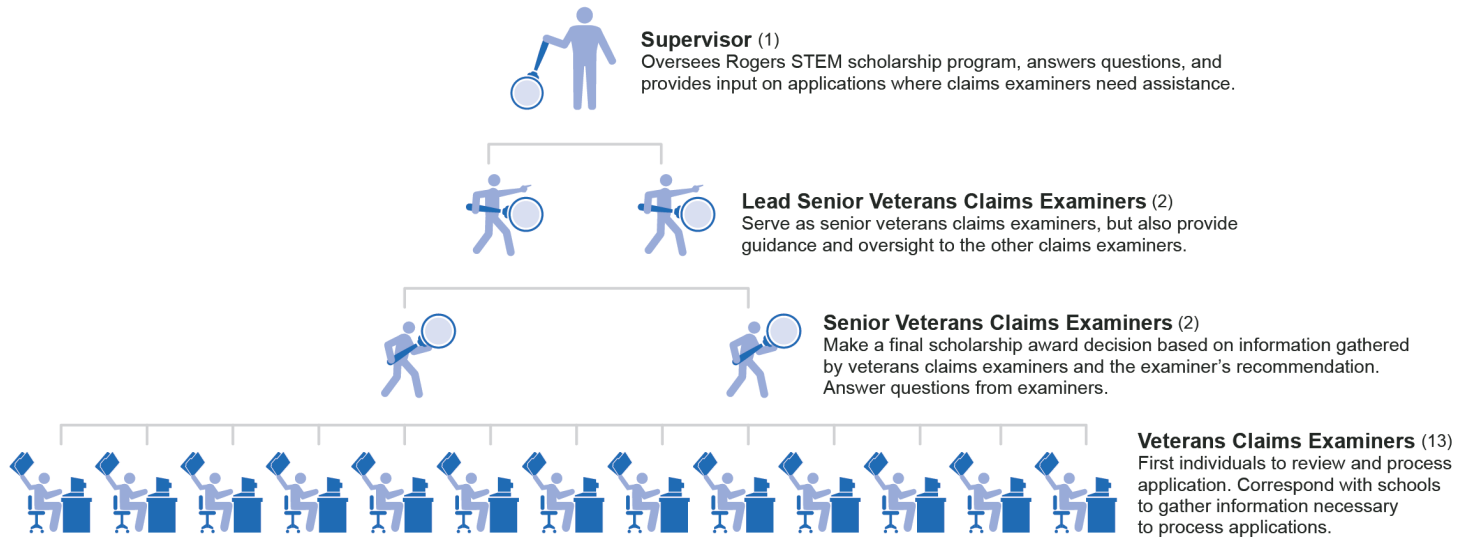
After receiving information from the school certifying official, the VCE is to make a recommendation to a senior VCE on whether to approve or deny the veteran's scholarship application. The senior VCE is to review the VCE's recommendation, the scholarship application, and the information provided by the school certifying official before making the final approval or denial decision for each applicant.¹⁶

If VCEs and senior VCEs have questions, they can consult the lead senior VCEs and the supervisor of the Rogers STEM scholarship processing team (see fig. 3). For example, VA officials told us that the supervisor of the scholarship processing team can provide input when there are applications with unique circumstances.

¹⁵The term "school certifying official" means an employee of an educational institution with primary responsibility for certifying veteran enrollment at the educational institution.

¹⁶VA awards the scholarship on a monthly basis to all applicants who meet the eligibility criteria, if funding is available. According to VA officials, as of August 2023, VA has never run out of funding for the scholarship in any given year.

Figure 3: Overview of the Roles of VA's Edith Nourse Rogers STEM Scholarship Processing Team



STEM = science, technology, engineering, and mathematics

Source: GAO analysis of Department of Veterans Affairs documentation and interviews with VA officials; GAO (icons). | GAO-24-106492

Accessible Text for Figure 3: Overview of the Roles of VA's Edith Nourse Rogers STEM Scholarship Processing Team

- Supervisor (1 person) Oversees Rogers STEM scholarship program, answers questions, and provides input on applications where claims examiners need assistance.
 - Lead Senior Veterans Claims Examiners (2 people) Serve as senior veterans claims examiners, but also provide guidance and oversight to the other claims examiners.
 - Senior Veterans Claims Examiners (2 people) Make a final scholarship award decision based on information gathered by veterans claims examiners and the examiner's recommendation. Answer questions from examiners.
 - Veterans Claims Examiners (13 people) First individuals to review and process application. Correspond with schools to gather information necessary to process applications.

(STEM = science, technology, engineering, and mathematics)

Source: GAO analysis of Department of Veterans Affairs documentation and interviews with VA officials; GAO (icons). | GAO-24-106492

Training. VCEs receive classroom and on-the-job training when they begin processing scholarship applications. These trainings include

overviews of eligibility requirements for the scholarship and the application review process. In addition, VCEs receive ongoing training on various topics, such as changes to policies and procedures.

Application processing guide. VCEs have an application processing guide that details how to review applications and record relevant information in VA's data system. It also includes email templates that guide how VCEs gather information from schools.

In addition, VA reviews the VCEs' work and verifies the accuracy of information provided by schools through the appeals process, quality team reviews, and compliance surveys, according to VA officials and documents.

- **Appeals process.** Veterans can request that VA reconsider the denial of a scholarship application. Through this appeals process, veterans can elect to provide new information for VA to review. For example, a veteran may provide an updated transcript that accurately shows the credits they already earned toward their degree, according to VA officials. Veterans can also request VA re-review their application without providing new information.
- **Quality team.** VA's quality team retroactively reviews a small number of applications or payments processed by the Rogers STEM scholarship VCEs every month. After this review, the quality team informs VCEs if they find any deficiencies, according to VA officials. Two VCEs in our discussion groups said they received quality team feedback related to their work on Rogers STEM scholarship applications and the quality team identified no major deficiencies. According to the quality team, feedback with no major deficiencies can include suggestions for how to improve future application reviews.
- **Compliance surveys.** VA uses compliance surveys to help ensure schools submit accurate information for VA education benefits, including the Rogers STEM scholarship. In these surveys, VA reviews a sample of school records and compares them to the information received from schools that VA used to make funding decisions for VA education benefits. For example, officials review records related to veterans' enrollment and their progress towards their degree. According to VA documents, officials conduct these surveys to help ensure schools comply with all VA educational benefit requirements. These surveys generally occur every 2–3 years for all schools with students receiving VA education benefits.

Unclear and Incomplete Resources for School Officials Could Result in VA Not Consistently Processing Some Rogers STEM Scholarship Applications

All Rogers STEM Scholarship Applications

School certifying officials sometimes provide inadequate information to VA that may cause inconsistencies in application award decisions, according to our VCE discussion groups. As part of the application process, VCEs are to contact a school certifying official to request information related to a veteran's eligibility for the scholarship. For example, VCEs request that the school certifying official provide information on credit hours earned by a veteran and the number of credit hours required by a veteran's program.

According to our discussion groups with VCEs and an internal VA report, examples of inadequate information that VA received from school certifying officials included:

- School certifying officials providing the number of credits a veteran is expected to earn by the end of a semester, instead of the credits a veteran has already earned.
- School certifying officials reporting that a degree requires fewer credits than it does because the officials do not include general education requirements.¹⁷
- School certifying officials not responding within 30 days of receiving VA's request, which results in VA closing the application without a decision regarding the veteran's eligibility for the scholarship.

Without adequate information from schools, VCEs could make inconsistent application award decisions for veterans in similar circumstances, including denying the scholarship to veterans who may be eligible. VCEs in two of four discussion groups told us that they had recommended denying the scholarship to veterans who they believed

¹⁷Department of Veterans Affairs, *From STEM to Stern: Overcoming the Underutilization of the Edith Nourse Rogers STEM Scholarship*.

could have been otherwise eligible had the school certifying official provided adequate information.¹⁸

VCEs in all four discussion groups said that they sometimes exchange multiple emails with school certifying officials to identify needed information or correct inaccurate information sent by the school certifying official. In addition, VCEs said they pause processing an application until the school certifying official provides all needed information, which delays the application award decision. In cases where the school certifying official does not respond to VA's inquiries within 30 days the application is closed.¹⁹ In both circumstances, VA officials may have made a different application award decision had school certifying officials provided adequate or timely information, according to VA officials.

We reported in 2022 that veterans may delay their education until they find out whether they are approved for the scholarship.²⁰ In addition, a VCE explained that sometimes a veteran could miss a school payment deadline or have to pay out of pocket while VA waits for a school certifying official to provide requested information.

Our review of VA's request for information identified wording and formatting that is potentially unclear. In addition, according to our interviews with VA officials, incomplete written resources provided to schools may contribute to schools providing inadequate responses. Specifically:

Request for Information. When VA receives a scholarship application, the VCE is to contact the school certifying official requesting additional information. According to VA documentation and officials, this contact

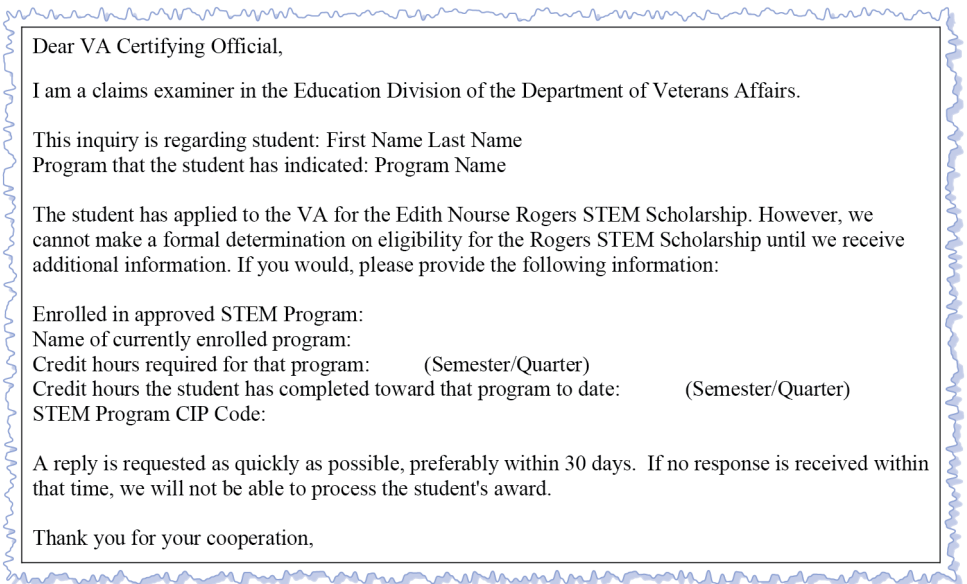
¹⁸VCEs in the remaining two groups discussed issues with information provided by schools but did not mention this specific outcome.

¹⁹An application closure is not the same as an application denial. In these circumstances, VA will send a letter to the veteran and the school informing them that VA closed the application. According to VA officials, when veterans become aware of the application closure, the veteran can ask their school certifying official to send the information VA requested.

²⁰[GAO-22-105326](#).

generally occurs using an email that follows a template provided in the application processing guide for VCEs (see fig. 4).²¹

Figure 4: Email Template Veterans Claims Examiners Send to Schools to Obtain Information Needed to Determine Veteran Eligibility for VA's Edith Nourse Rogers STEM Scholarship



STEM = science, technology, engineering, and mathematics

Source: Department of Veterans Affairs Guide to Processing STEM Applications in DGI (Digital GI Bill), 3/17/2023. | GAO-24-106492

Accessible Text for Figure 4: Email Template Veterans Claims Examiners Send to Schools to Obtain Information Needed to Determine Veteran Eligibility for VA's Edith Nourse Rogers STEM Scholarship

Dear VA Certifying Official,

I am a claims examiner in the Education Division of Veterans Affairs.

This inquiry is regarding student: First Name Last Name
Program that the student has indicated: Program Name

The student has applied to the VA for the Edith Nourse Rogers STEM Scholarship. However, we cannot make a formal determination on

²¹VA uses a modified version of the template email when requesting information for students in covered clinical training programs and teaching certification programs. Given the magnitude of applications for undergraduate degree programs, we use the undergraduate degree template as the example in our discussion of the emails.

eligibility for the Rogers STEM Scholarship until we receive additional information. If you would, please provide the following information:

Enrolled in approved STEM Program:

Name of currently enrolled program:

Credit hours required for that program: (Semester/Quarter)

Credit hours the student has completed toward that program to date:
(Semester/Quarter)

STEM Program CIP Code:

A reply is requested as quickly as possible, preferably within 30 days. If no response is received within that time, we will not be able to process the student's award.

Thank you for your cooperation,

(STEM = science, technology, engineering, and mathematics)

Source: Department of Veterans Affairs Guide to Processing STEM Applications in DGI (Digital GI Bill), 3/17/2023. | GAO-24-106492

However, VA's email template is unclear and does not fully explain what VA needs. For example:

- The template does not make clear that "credit hours required" or "credit hours completed" toward a program include general education credits.
- The template's format makes it unclear what "(semester/quarter)" refers to regarding the hours completed towards the student's program. This may lead to questions about whether VA is asking for credits that were completed as of that semester or quarter, or as of the date of the email request.
- The template expects school officials to answer yes or no regarding whether a student's major is an approved STEM program, which should be determined by VA staff. However, the school's interpretation of an "approved STEM program" may not align with what VA has determined is STEM for the purposes of the Rogers STEM scholarship.

According to VA officials, the template assumes the reader has background knowledge on the scholarship program that would inform their understanding of the email. Officials also stated it could be beneficial to further explain the request to school certifying officials.

Written Resources. VA maintains a publicly available School Certifying Official Handbook with information on the Rogers STEM scholarship, including the funding available and most eligibility requirements.²² There is also a page on VA's website dedicated to the scholarship. However, the handbook and the website do not describe the school's role in the Rogers STEM scholarship application process. For example, these resources do not explain that VA will request information from schools that is essential for application processing. The handbook and website also do not describe how VA expects schools to respond to its request. For example, they do not explain whether the credit hours that a school reports should be for an entire degree or for the specific major a veteran is pursuing.

As of July 2023, VA does not have plans to provide information on the school's role in the scholarship application process in these written resources. According to VA officials, there is a benefit to publicly explaining the role of the school certifying officials in the application process, including on the website. Yet, officials said they were concerned that the handbook is lengthy and adding information dilutes what is currently included. However, including the information in VA's written resources helps ensure that a school certifying official has access to necessary information.

According to VA's 2022–2028 Strategic Plan, VA will ensure information about benefits is clear and easy to understand and access.²³ Improving the written resources available to school certifying officials could help VA achieve this goal. It could also help ensure school certifying officials have information to enable them to provide adequate and timely responses to VA's information requests, thereby helping VA process award applications in a timely and consistent manner.

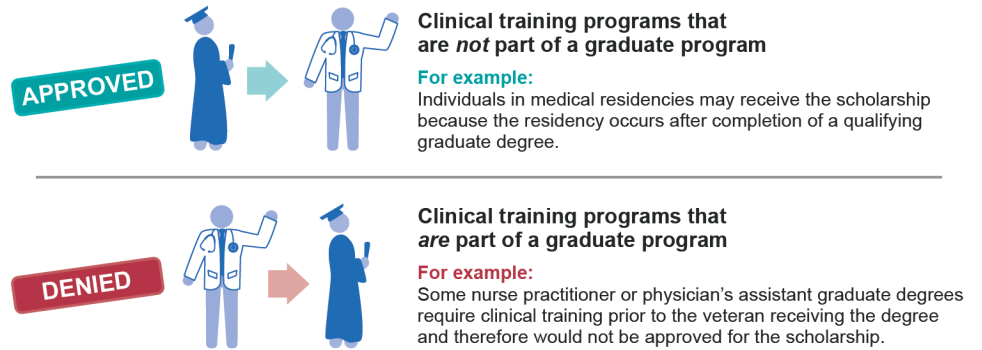
²²The handbook is not specific to the Rogers STEM scholarship program and includes information on all veteran education benefits.

²³Department of Veterans Affairs, *Department of Veterans Affairs Fiscal Years 2022-28 Strategic Plan*. (Washington, D.C.). Strategic Objective 1.1. In addition, Standards for Internal Control in the Federal Government state that management should externally communicate the necessary quality information to achieve the entity's objectives. [GAO-14-704G](#). Principle 15.

Rogers STEM Scholarship Applications for Clinical Training Programs

According to participants in all four of our VCE discussion groups, obtaining necessary application information for clinical training programs from school certifying officials can be particularly difficult. Clinical training programs have nuanced eligibility requirements. According to VA policy, students enrolled in clinical training programs are eligible for the scholarship if the clinical training program is not part of a graduate degree program.²⁴ For example, medical residency, which occurs after a doctor receives a medical degree, can be approved. However, hospital-based training that occurs while a student is earning a medical degree would not be approved (see fig. 5).

Figure 5: Examples of Clinical Training Programs and Their Eligibility for VA’s Edith Nourse Rogers STEM Scholarship



Source: GAO analysis of Department of Veterans Affairs (VA) documentation, interviews with VA officials, and GAO-20-162; GAO (icons). | GAO-24-106492

Accessible Text for Figure 5: Examples of Clinical Training Programs and Their Eligibility for VA’s Edith Nourse Rogers STEM Scholarship

Approved: Clinical training programs that are not part of a graduate program

²⁴Under 38 U.S.C. § 3320(b)(4)(B) and (C), veterans who have earned a postsecondary degree or a graduate degree in an approved STEM degree field and are enrolled in a covered clinical training program for health care professionals may be eligible to use the scholarship while enrolled in a covered clinical training program. A covered clinical training program means any clinical training required by a health care professional to be licensed to practice in a state or locality. For the purposes of this report, we refer to covered clinical training programs as clinical training programs.

- For example: Individuals in medical residencies may receive the scholarship because the residency occurs after completion of a qualifying graduate degree.

Denied: Clinical training programs that are part of a graduate program

- For example: Some nurse practitioner or physician's assistant graduate degrees require clinical training prior to the veteran receiving the degree and therefore would not be approved for the scholarship.

Source: GAO analysis of Department of Veterans Affairs (VA) documentation, interviews with VA officials, and GAO-20-162; GAO (icons). | GAO-24-106492

Notes: Under 38 U.S.C. § 3320(b)(4)(B) and (C), veterans who have earned a postsecondary degree or a graduate degree in an approved science, technology, engineering, and mathematics (STEM) degree field and are enrolled in a covered clinical training program for health care professionals may be eligible to use the scholarship while enrolled in a covered clinical training program. A covered clinical training program means any clinical training required by a health care professional to be licensed to practice in a state or locality. This figure refers to covered clinical training programs as clinical training programs.

VCEs explained that misunderstandings regarding what is an eligible clinical training program can cause delays in application processing because discussions over clinical training eligibility requirements can be extensive. One VCE we spoke to said the VCE may correspond with a school three or four times to get the information requested for clinical training-related applications. Almost all VCEs agreed that it can be difficult to get the information needed from a school to process applications for clinical training programs.

According to our analysis of VA documents, the School Certifying Official Handbook and scholarship website do not fully describe the clinical training eligibility requirements. Neither the handbook nor the website state VA's policy that the clinical training program must be separate from a graduate degree in order for a student to be eligible for the scholarship. According to VA officials, eligibility requirements for clinical training programs is the top question the scholarship processing team receives from schools and veterans. The officials said it should be explicitly stated in a public resource that eligible clinical training programs cannot be part of a graduate degree program.

According to VA's 2022–2028 Strategic Plan, VA will use multiple channels and methods to ensure information about benefits is clear and accessible.²⁵ Further, federal internal control standards call for

²⁵Department of Veterans Affairs Fiscal Years 2022-28 Strategic Plan. Strategic Objective 1.1.

management to communicate quality information externally.²⁶ By including complete clinical training eligibility requirements in the handbook and on VA's website, VA could better ensure that school certifying officials have all the information they need to effectively provide information to VCEs. This could help eliminate some delays for veterans awaiting scholarship award decisions.

VA Does Not Have Information and Procedures Needed for Staff to Consistently Determine Whether a Major is Eligible for the Scholarship

VA staff do not have the information and procedures they need to consistently determine whether a major is eligible for the scholarship in instances where the major is not obviously STEM. Some STEM majors are easy to identify, such as engineering or mathematics. Examiner judgment becomes part of the application award process when a veteran's major is not a STEM major explicitly listed on VA's list of majors eligible for the scholarship. This accounts for a small proportion of Rogers STEM scholarship applications.

Using VA administrative data and VA's list of majors eligible for the scholarship, we identified over 100 instances where VA potentially made erroneous scholarship award decisions, based on our identification of majors approved for the scholarship that did not appear to be STEM, such as history and anthropology. We provided VA a list of these instances for review. In its review, the agency confirmed that in 56 instances it appeared the department approved the scholarship for veterans pursuing ineligible majors.²⁷ These 56 instances reflect erroneous approval of up to \$1.7 million in scholarship funds.²⁸ VA

²⁶GAO-14-704G. Principle 15.

²⁷The scholarship may be used for education programs such as clinical training programs, teaching certification programs, and undergraduate STEM degree programs. Given that the vast majority of scholarship recipients use the scholarship toward an undergraduate degree, we refer to these education programs as "majors."

²⁸We calculated this amount by multiplying each erroneous scholarship approval by \$30,000, which is the maximum amount a veteran can use under the scholarship. Veterans do not necessarily use the entire \$30,000.

officials also stated that it appeared the department should not have denied 10 applications based on the veteran's major.²⁹

Using this analysis of VA administrative data and interviews with VA officials, we identified two areas where the scholarship processing team did not have formal procedures or information they could use to minimize examiner judgment and help ensure consistent scholarship award decisions. Specifically:

Review of application CIP codes and majors. VA does not have formal procedures for VCEs to raise questions about or further examine instances where a school provided a Classification of Instructional Programs (CIP) code from the eligible STEM majors list for a major that does not appear to match that CIP code.

VA maintains a list of majors eligible for the Rogers STEM scholarship, organized by CIP code. CIP codes can provide uniformity among different names schools can give to a major. For example, schools may use various terms to refer to a general psychology major such as "BA Psychology," "Bachelors of Science Psychology," or "Psychology General." Yet, the CIP code used for a general psychology major is 42.0101 regardless of the name of the major provided by the school.

VA officials said the agency does not confirm or otherwise verify that the CIP code provided by a school is correct in instances when it does not appear to be the correct CIP code for a major in an application. For example, multiple applications approved for the scholarship listed the major of construction management (not eligible for the scholarship) but included the CIP code for an engineering major (eligible for the scholarship).³⁰ In these cases, there are no procedures requiring VCEs to

²⁹VA officials said they reviewed these cases to determine the veterans' current eligibility for the scholarship. They subsequently approved three veterans for the scholarship. The remaining veterans either have funds available under other VA education benefits or VA contacted the veteran's school to determine whether the veteran is still enrolled in a program eligible for the scholarship. According to VA officials, if VA learns a veteran was erroneously denied the scholarship, there are two options to correct the error. If a student used other funding to pursue their STEM degree, VA would make retroactive payments to the school and student to refund that funding. If a student dropped out of school because of the denial, VA could award the scholarship to the student so the student could resume their studies.

³⁰We identified 21 approved applications with a construction management major and an engineering major CIP code. These 21 applications are included in the 56 instances VA confirmed as appearing to be erroneous.

raise questions or further examine the mismatch between the major name and CIP code. As long as the CIP code is on the list of eligible majors and meets all other eligibility criteria, the application is generally approved, according to VA documentation and officials.

Further, in a discussion group, VCEs provided additional examples of instances where VA had approved scholarship applications when the CIP code provided by the school was on the list of eligible majors, but the major listed in the application did not appear related to the CIP code or eligible for the scholarship. For example, a VCE said VA approved a business major for the scholarship, even though it did not appear to qualify as a STEM major. The application was approved because the school provided VA with a non-business major CIP code from the eligible major list. Another VCE said VA approved a film production major for the scholarship because the school provided an eligible STEM CIP code for a non-film production major.

Officials said there is no expectation that VCEs or others raise questions or further examine potentially mismatched STEM and non-STEM CIP codes and majors to ensure they accurately represent a veteran's major and school's CIP code for that major. VA's lack of formal procedures to ensure VA staff consistently evaluate the relationship between the CIP code and the major in an application is contrary to a strategic objective in VA's 2022–2028 Strategic Plan. The objective states that VA will improve governance, management practices, and make evidence-based decisions to ensure quality outcomes and experiences and efficient use of resources.³¹

When asked what actions VA can take if they learn a school provided incorrect information, officials said VA could retroactively verify the validity of the CIP code for the major given by the school through existing compliance surveys, although VA has not found CIP code inaccuracies during a compliance survey. However, these surveys generally occur every 2 to 3 years, according to VA officials, meaning a significant amount of time could have passed since VA approved the scholarship award. In addition, these surveys include a sample of records across VA education benefit programs, including the Rogers STEM scholarship. They do not solely focus on the accuracy of scholarship applications.

³¹Department of Veterans Affairs Fiscal Years 2022-28 Strategic Plan. Stewardship Objective 4.4.

Although compliance surveys provide VA an opportunity to review and correct information used to provide benefits, they are not a preventative measure to avoid erroneous approvals and payments. As we reported in 2022, preventative control activities generally offer agencies the most cost-efficient use of resources to help ensure payment integrity.³²

Preventative procedures could help VA avoid paying scholarship funds to ineligible veterans, which VA may not necessarily recover. Currently, VA does not check school CIP code lists to confirm the school provided the proper CIP code for the stated major, but doing so would be a potential preventative procedure. Without formal procedures for following up on instances where the major and CIP code do not appear to match, VA could approve scholarships for veterans pursuing ineligible majors.

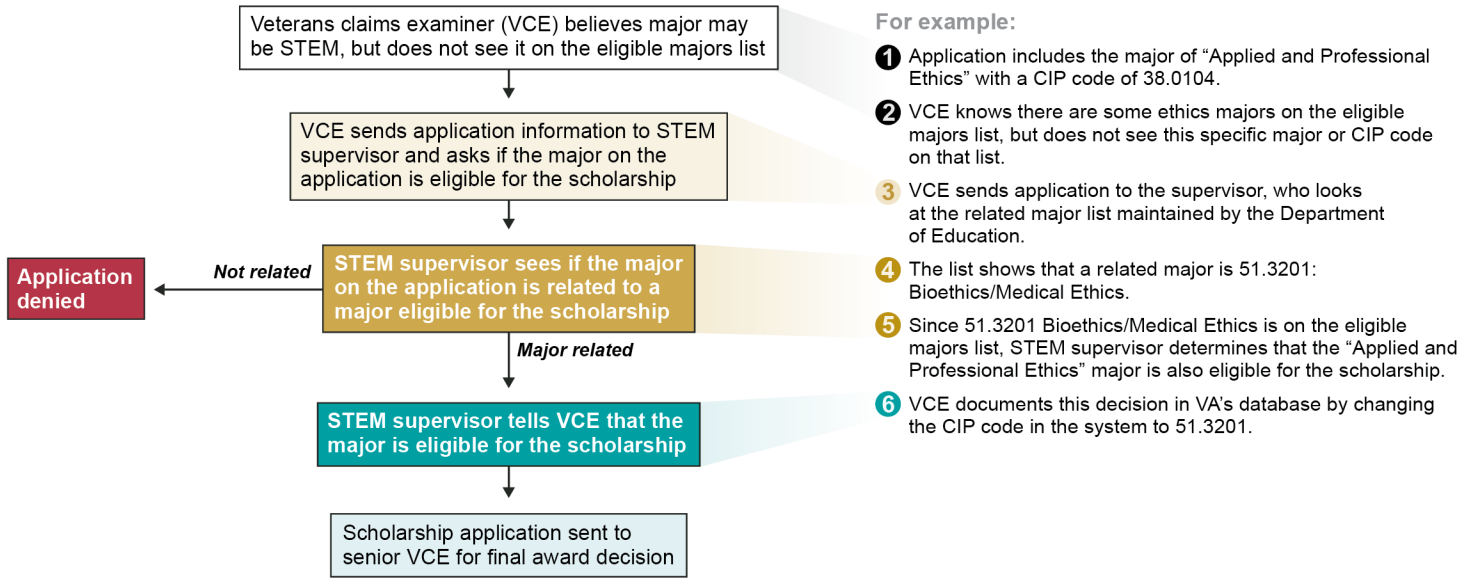
Incomplete eligible majors list. VA does not include all eligible majors in the list of majors eligible for the scholarship. According to VA officials, this has led to some veterans being incorrectly denied the scholarship. For example, two veterans were incorrectly denied the scholarship because their major of social work, while eligible, does not appear on the list of majors eligible for the scholarship. VCEs, schools, and veterans use the eligible majors list to determine if a major is eligible for the scholarship.

However, VA will award the scholarship to veterans pursuing a major not on the eligible list if that major is considered to be closely related to an eligible major, according to VA officials. If a VCE reviews an application with a CIP code and major not on the eligible list, but believes it is a “potentially eligible” STEM major, the examiner could ask the supervisor for the Rogers STEM scholarship processing team to review the CIP code and major. The supervisor uses a list of majors considered to be closely related to one another to decide whether the major is a STEM major for the purposes of the scholarship (see fig. 6).³³ This process, however, relies on examiner judgment to identify potentially eligible STEM majors.

³²GAO, *COVID-19: Significant Improvements Are Needed for Overseeing Relief Funds and Leading Responses to Public Health Emergencies*, [GAO-22-105291](#) (Washington, D.C.: Jan. 27, 2022).

³³Department of Education, who maintains the CIP code list, also developed the list of closely related majors, for purposes unrelated to the Rogers STEM scholarship. VA decided to use this list to help them identify STEM majors.

Figure 6: VA Process to Determine Whether a Major Is Closely Related to Majors Eligible for the Edith Nourse Rogers STEM Scholarship



STEM= science, technology, engineering, and mathematics
 CIP= Classification of Instructional Programs

Source: GAO analysis of Department of Veterans Affairs (VA) and Department of Education documentation and interviews with VA officials. | GAO-24-106492

Accessible Text for Figure 6: VA Process to Determine Whether a Major Is Closely Related to Majors Eligible for the Edith Nourse Rogers STEM Scholarship

STEM= science, technology, engineering, and mathematics

CIP= Classification of Instructional Programs

1. Veterans claims examiner (VCE) believes major may be STEM, but does not see it on the eligible majors list
2. VCE sends application information to STEM supervisor and asks if the major on the application is eligible for the scholarship
3. STEM supervisor sees if the major on the application is related to a major eligible for the scholarship
4. If the major is related, STEM supervisor tells VCE that the major is eligible for the scholarship
 - a. If the major is not related, the application is denied
5. Scholarship application sent to senior VCE for final award decision

For example:

1. Application includes the major of "Applied and Professional Ethics" with a CIP code of 38.0104.

-
2. VCE knows there are some ethics majors on the eligible majors list, but does not see this specific major or CIP code on that list.
 3. VCE sends application to the supervisor, who looks at the related major list maintained by the Department of Education.
 4. The list shows that a related major is 51.3201: Bioethics/Medical Ethics.
 5. Since 51.3201 Bioethics/Medical Ethics is on the eligible majors list, STEM supervisor determines that the “Applied and Professional Ethics” major is also eligible for the scholarship.
 6. VCE documents this decision in VA’s database by changing the CIP code in the system to 51.3201.

Source: GAO analysis of Department of Veterans Affairs (VA) and Department of Education documentation and interviews with VA officials. | GAO-24-106492

Note: VCEs gather and review information for scholarship applications. Senior VCEs typically review the information the VCEs gather. Senior VCEs make final decisions on whether to award a veteran the scholarship. The STEM supervisor oversees all senior VCEs and VCEs on the Rogers STEM scholarship processing team and provides input on some applications.

VA officials explained that they use this process to approve any major that is closely related to a major on the eligible list. Yet, VA has not updated the eligible STEM majors list with these closely related majors. As a result, the eligible major list does not include all majors VA has determined are eligible for the scholarship, which can hinder VCEs’ abilities to correctly and consistently determine whether a major in an application is eligible. Further, potential applicants and their schools are not fully aware of all majors that VA considers eligible for the scholarship because a complete list is not publicly available. Therefore, veterans may not apply if they do not see their major on the incomplete publicly available list.

VA officials said they would support the creation of a more comprehensive eligible majors list, but VA has not created such a list. This does not align with VA’s 2022–2028 Strategic Plan, which states that VA will improve governance, management practices, and make evidence-based decisions to ensure quality outcomes and experiences and efficient use of resources.³⁴ Without a comprehensive list of majors eligible for the scholarship, VCEs could inadvertently deny the scholarship to otherwise eligible veterans.

³⁴Department of Veterans Affairs Fiscal Years 2022-28 Strategic Plan. Stewardship Objective 4.4.

Conclusions

Thousands of veterans have used the Rogers STEM scholarship to pursue STEM degrees since the program began in August 2019. However, VA could better ensure that school officials provide VA the information the agency needs to process applications in a consistent and timely manner. Clarifying written materials for school certifying officials could help reduce application delays and avoid inadvertently denying a veteran the scholarship. Adding procedures to the application review process and updating the eligible majors list could give VA staff additional tools to approve or deny applicants consistently, so that veterans appropriately receive scholarship funds.

Recommendations for Executive Actions

We are making the following four recommendations to VA:

The Secretary of Veterans Affairs should clarify in its written resources for school certifying officials the role of schools in the Rogers STEM scholarship application process and the information needed from these officials. (Recommendation 1)

The Secretary of Veterans Affairs should clarify the Rogers STEM scholarship eligibility requirements for clinical training programs on its website and in the School Certifying Official Handbook. (Recommendation 2)

The Secretary of Veterans Affairs should develop and implement formal procedures for VA staff to examine potentially mismatched STEM and non-STEM Classification of Instructional Programs codes and majors to ensure they accurately represent a veteran's major and the correct code for that major. (Recommendation 3)

The Secretary of Veterans Affairs should update the list of majors eligible for the Rogers STEM scholarship, ensure veterans claims examiners have access to a complete list, and make this complete list publicly available. (Recommendation 4)

Agency Comments

We provided a draft of this report to VA for review and comment. In its written comments, VA concurred with our recommendations. It said it will update resources based on feedback it will gather from school certifying officials. The agency also said it would formalize procedures to review and update the list of majors eligible for the scholarship. VA plans to publish this updated list so it is available to veterans claims examiners, school officials, and interested students. VA's comments are reproduced in appendix IV.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Veterans Affairs, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (617) 788-0534 or emreyarrasm@gao.gov. GAO staff who made key contributions to this report are listed in appendix V.



Melissa Emrey-Arras
Director, Education, Workforce, and Income Security Issues

Appendix I: Changes Made to Science, Technology, Engineering, and Mathematics Majors by Select Colleges since 2017

To identify changes made by select colleges to science, technology, engineering, and mathematics (STEM) undergraduate majors, we surveyed the 30 colleges with the most Edith Nourse Rogers STEM Scholarship recipients in the 2021-2022 school year.¹ The Department of Veterans Affairs identified these 30 colleges and provided contact information for their school certifying officials. Each college then selected one point of contact who could best answer the survey questions. We encouraged the points of contact to include other college staff who may also have been knowledgeable about the survey questions. We also pretested the survey with officials from two schools.

We administered a web survey from March 2023 to April 2023. We sent two email reminders and called nonrespondents prior to closing the survey. We received 27 out of 30 possible responses, resulting in a response rate of 90 percent. The responses provided by the colleges' representatives are not generalizable to all colleges. Rather, they provide illustrative examples of colleges' experiences adding, modifying, and removing STEM undergraduate majors since August 2017.

Twenty-two survey respondents have created, modified, or removed at least one STEM major since August 2017. Specifically:

- 18 respondents created at least one STEM major,
- 19 respondents modified at least one STEM major, and
- 9 respondents removed at least one STEM major.

¹The Harry W. Colmery Veterans Educational Assistance Act of 2017 includes a provision for us to provide a final assessment of the Rogers STEM scholarship program, including an assessment of the extent to which colleges have made changes to STEM degrees or programs of education offered by the college since August 2017.

**Appendix I: Changes Made to Science,
Technology, Engineering, and Mathematics
Majors by Select Colleges since 2017**

The majority of respondents said they created, modified, or removed a STEM major to respond to either student needs or to industry changes. For example, officials from one school stated that the school added a Bachelor of Science degree in civil engineering because research showed it had the greatest workforce needs of any engineering field. Officials from another college said the school added a mathematical biology major to provide an interdisciplinary area of study that would include students who historically have been excluded in interdisciplinary mathematical careers. Finally, officials from one school stated the school stopped offering a bachelor's degree in math because fewer than 500 students enrolled.

Appendix II: Employment Outcomes for Veterans with Science, Technology, Engineering, and Mathematics Bachelor's Degrees

To determine the employment, occupation, and income of veterans who recently earned science, technology, engineering, and mathematics (STEM) degrees, we analyzed data from the 2016/2017 Baccalaureate and Beyond Longitudinal Study (B&B).¹ These B&B data were the most recent available. The B&B is a nationally representative survey of students who completed all bachelor's degree requirements in the 2015-2016 school year, and who received a bachelor's degree no later than June 30, 2017. The B&B study uses fields of study to categorize student degree programs. We defined the fields of study in the B&B as STEM or not-STEM by comparing the B&B fields of study to the majors approved for the Edith Nourse Rogers STEM Scholarship. We categorized fields of study in B&B as STEM if they were similar to majors approved by VA for the scholarship. We then analyzed income and employment outcomes for veterans with a bachelor's degree in STEM. These results are not specific to veterans who received the Rogers STEM scholarship.²

We took steps to confirm the reliability of the B&B data, including reviewing documentation. We found the B&B data to be sufficiently reliable for the purposes of describing the outcomes of veterans with STEM bachelor's degrees.

Our analysis found that veterans who completed a STEM bachelor's degree during the 2015-2016 academic year had estimated median

¹The Harry W. Colmery Veterans Educational Assistance Act of 2017 includes a provision for us to provide a final assessment of the Rogers STEM scholarship program, including the job placement rate, median annual earnings, and length of employment for scholarship recipients.

²As we reported in 2022, the Department of Veterans Affairs does not collect employment and income data specific to veterans who received the Rogers STEM scholarship. [GAO-22-105326](#).

**Appendix II: Employment Outcomes for
Veterans with Science, Technology,
Engineering, and Mathematics Bachelor's
Degrees**

starting earnings of \$44,913 per year within the first 12 months after completing a degree.³ Additionally, we found that:

- an estimated 93 percent of these veteran STEM graduates found a job within 12 months of completing a degree;⁴
- an estimated 85 percent of these veteran STEM graduates that had a job within 12 months of completing a degree felt their job was closely related to their field of study;⁵ and
- an estimated 83 percent of these veteran STEM graduates were employed for at least 6 of the 12 months after completing a degree.⁶

³The earnings presented are within a confidence interval extending from \$41,502 to \$48,324.

⁴The statistic presented is within a confidence interval extending from 90 percent to 95 percent.

⁵The statistic presented is within a confidence interval extending from 81 percent to 89 percent.

⁶The statistic presented is within a confidence interval extending from 78 percent to 87 percent.

Appendix III: Additional Details on Selected Methodologies

Data Analysis - Department of Veterans Affairs Administrative Data for Edith Nourse Rogers STEM Scholarship

We analyzed VA administrative data for all Rogers STEM scholarship applicants from the start of the program in August 2019 to June 2023.¹ The administrative data included individual-level records for each veteran who applied for or received these benefits.² We analyzed the data to determine the number of veterans who applied for or used these benefits. We also analyzed the data to report on characteristics of these veterans, such as their major, age, and type of institution where they used the scholarship.³ We also determined the number of veterans who obtained a science, technology, engineering, and mathematics (STEM) degree while receiving scholarship benefits.

We also used this data to report on the consistency of scholarship application awards and denials. This analysis included identifying instances where VA potentially awarded scholarships to individuals

¹Specifically, we analyzed data from August 1, 2019 to June 10, 2023. The Harry W. Colmery Veterans Educational Assistance Act of 2017 includes a provision for us to provide a final assessment of the Rogers STEM scholarship program, including a comparison of requested data points for veterans participating in the scholarship program to eligible veterans who did not participate in the program. However, it is not possible to identify a veteran who is eligible for the program until the veteran applies for the scholarship and a veterans claims examiner contacts the veteran's school for certain information. In addition, the Act includes a provision for us to provide an explanation of the identification by the Secretary of Veterans Affairs of subjects and fields meeting national needs as defined in the Act. According to VA officials they have completed no such identification.

²Non-veterans are eligible for the scholarship under limited circumstances. Given that few non-veterans receive the scholarship compared to veterans, we generally refer to all recipients and applicants as veterans.

³The scholarship may be used for education programs such as clinical training programs, teaching certification programs, and undergraduate STEM degree programs. Given that the vast majority of scholarship recipients use the scholarship toward an undergraduate degree, we refer to these education programs as "majors."

pursuing non-STEM degrees. We identified potential non-STEM degrees by comparing the Classification of Instructional Programs (CIP) code provided by the school to the major listed in the application. If the CIP code did not appear to match the major, we used VA's list of majors eligible for the scholarship and Department of Education's list of CIP codes to see whether the listed major potentially matched with a non-STEM CIP code. If the major matched to a non-STEM CIP code, we considered the major to potentially not be STEM for the purposes of the scholarship. We also reviewed the small number of instances where the provided CIP code may have matched the major on the application but was not on the approved list of CIP codes for the scholarship. Finally, we reviewed instances where a CIP code and major was approved on some applications but denied on others, where the applications did not appear to be denied for reasons other than the major/CIP code. We asked VA to review the cases we identified under these analyses and identify instances where it appeared VA made an erroneous award decision. Our analysis should not be used to draw conclusions about the agency's legal compliance.

We took steps to confirm the reliability of the VA administrative data for scholarship recipients, including reviewing documentation and testing the data for irregularities and missing data. We also interviewed VA officials knowledgeable about the data. We determined the VA administrative data to be sufficiently reliable for reporting the number and characteristics of veterans enrolled in STEM programs using the Rogers STEM scholarship and identifying potential inconsistencies in application approvals and denials.

Discussion Groups and Interviews with VA Staff

To evaluate how consistently VA processed Rogers STEM scholarship applications, we held four discussion groups with the 12 available claims examiners on the scholarship processing team.⁴ These groups ranged from two to four participants. In addition, we interviewed the supervisor of the Rogers STEM scholarship application processing team, the two lead senior claims examiners, and the two senior claims examiners.

We also interviewed other relevant VA officials. Specifically, we interviewed the claims examiners who process appeals for the

⁴One claims examiner was not available when we spoke with the other claims examiners.

Appendix III: Additional Details on Selected Methodologies

scholarship to learn more about the appeals process. We also interviewed representatives from VA's quality team, who work on quality assurance measures across VA educational programs and senior VA officials who oversee the work of the scholarship team.

Appendix IV: Comments from the Department of Veterans Affairs

Appendix IV: Comments from the Department
of Veterans Affairs



DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON

December 12, 2023

Ms. Melissa Emrey-Arras
Director
Education, Workforce
and Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Emrey-Arras:

The Department of Veterans Affairs (VA) has reviewed the Government Accountability Office (GAO) draft report: **HIGHER EDUCATION: VA Should Provide Additional Information to Its Staff and Schools on the Rogers STEM Scholarship** (GAO-24-106492).

The enclosure contains the action plan to address the draft report recommendations. VA appreciates the opportunity to comment on your draft report.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly Jackson".

Kimberly Jackson
Chief of Staff

Enclosure

Enclosure

The Department of Veterans Affairs (VA) Comments to
the Government Accountability Office (GAO) Draft Report
**HIGHER EDUCATION: VA Should Provide Additional Information to Its Staff
and Schools on the Rogers STEM Scholarship**
(GAO-24-106492)

Recommendation 1: The Secretary of Veterans Affairs should clarify in its written resources for school certifying officials the role of schools in the Rogers Science, Technology, Engineering, and Mathematics (STEM) scholarship application process and the information needed from these officials.

VA Response: Concur. The Veterans Benefits Administration (VBA) will work with school certifying officials to better identify the gap in the existing policy/procedures regarding the role of schools in the Rogers STEM scholarship application process and clarify the information needed. Based on this feedback, VBA will update the appropriate and necessary written resources.

Target Completion Date: March 1, 2024.

Recommendation 2: The Secretary of Veterans Affairs should clarify the Rogers STEM scholarship eligibility requirements for clinical training programs on its website and in the School Certifying Official Handbook.

VA Response: Concur. VBA will work with school certifying official to better identify the gap between existing policy/procedures regarding the Rogers STEM scholarship eligibility requirements for clinical training programs and the interpretation of our external partners. VBA will then clarify the eligibility requirements and update the appropriate and necessary resources, to include updating VA's website and the school certifying official handbook.

Target Completion Date: March 1, 2024.

Recommendation 3: The Secretary of Veterans Affairs should develop and implement formal procedures for VA staff to examine potentially mismatched STEM and non-STEM Classification of Instructional Programs codes and majors to ensure they accurately represent a veteran's major and the correct code for that major.

VA Response: Concur. VBA will formalize procedures for a periodic recurring review and update to the STEM authorized majors list based on classification of instructional programs codes. VBA procedures will also include the publication of such updated list for use by VA claims processors, school officials, and interested students.

Target Completion Date: March 1, 2024.

**Appendix IV: Comments from the Department
of Veterans Affairs**

Enclosure

The Department of Veterans Affairs (VA) Comments to
the Government Accountability Office (GAO) Draft Report
***HIGHER EDUCATION: VA Should Provide Additional Information to Its Staff
and Schools on the Rogers STEM Scholarship***
(GAO-24-106492)

Recommendation 4: The Secretary of Veterans Affairs should update the list of majors eligible for the Rogers STEM scholarship, ensure veterans claims examiners have access to a complete list, and make this complete list publicly available.

VA Response: Concur. VBA will formalize procedures for a periodic recurring review and update to the STEM authorized majors list based on classification of instructional programs codes. VBA procedures will also include the publication of such updated list for use by VA claims processors, school officials, and interested students. The list is currently publicly available at:

https://benefits.va.gov/gibill/docs/fqib/STEM_Program_List.pdf.

Target Completion Date: March 1, 2024.

Accessible Text for Appendix IV: Comments from the Department of Veterans Affairs

December 12, 2023

Ms. Melissa Emrey-Arras
Director
Education, Workforce and Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Emrey-Arras:

The Department of Veterans Affairs (VA) has reviewed the Government Accountability Office (GAO) draft report: HIGHER EDUCATION: VA Should Provide Additional Information to Its Staff and Schools on the Rogers STEM Scholarship (GAO-24-106492).

The enclosure contains the action plan to address the draft report recommendations. VA appreciates the opportunity to comment on your draft report.

Sincerely,

Kimberly Jackson
Chief of Staff

Enclosure

The Department of Veterans Affairs (VA) Comments to the Government Accountability Office (GAO) Draft Report
HIGHER EDUCATION: VA Should Provide Additional Information to Its Staff and Schools on the Rogers STEM Scholarship
(GAO-24-106492)

Recommendation 1: The Secretary of Veterans Affairs should clarify in its written resources for school certifying officials the role of schools in the Rogers Science, Technology, Engineering, and Mathematics (STEM)

scholarship application process and the information needed from these officials.

VA Response: Concur. The Veterans Benefits Administration (VBA) will work with school certifying officials to better identify the gap in the existing policy/procedures regarding the role of schools in the Rogers STEM scholarship application process and clarify the information needed. Based on this feedback, VBA will update the appropriate and necessary written resources.

Target Completion Date: March 1, 2024.

Recommendation 2: The Secretary of Veterans Affairs should clarify the Rogers STEM scholarship eligibility requirements for clinical training programs on its website and in the School Certifying Official Handbook.

VA Response: Concur. VBA will work with school certifying official to better identify the gap between existing policy/procedures regarding the Rogers STEM scholarship eligibility requirements for clinical training programs and the interpretation of our external partners. VBA will then clarify the eligibility requirements and update the appropriate and necessary resources, to include updating VA's website and the school certifying official handbook.

Target Completion Date: March 1, 2024.

Recommendation 3: The Secretary of Veterans Affairs should develop and implement formal procedures for VA staff to examine potentially mismatched STEM and non-STEM Classification of Instructional Programs codes and majors to ensure they accurately represent a veteran's major and the correct code for that major.

VA Response: Concur. VBA will formalize procedures for a periodic recurring review and update to the STEM authorized majors list based on classification of instructional programs codes. VBA procedures will also include the publication of such updated list for use by VA claims processors, school officials, and interested students.

Target Completion Date: March 1, 2024.

Recommendation 4: The Secretary of Veterans Affairs should update the list of majors eligible for the Rogers STEM scholarship, ensure veterans claims examiners have access to a complete list, and make this complete list publicly available.

VA Response: Concur. VBA will formalize procedures for a periodic recurring review and update to the STEM authorized majors list based on classification of instructional programs codes. VBA procedures will also include the publication of such updated list for use by VA claims processors, school officials, and interested students. The list is currently publicly available at:

https://benefits.va.gov/gibill/docs/fgib/STEM_Program_List.pdf.

Target Completion Date: March 1, 2024.

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Melissa Emrey-Arras at (617) 788-0534 or emreyarrasm@gao.gov

Staff Acknowledgments

In addition to the contact named above, Andrea Dawson (Assistant Director), Kelsey Kreider (Analyst in Charge), and Andrew Nguyen made key contributions to the report. Additional assistance was provided by James Bennett, Sarah Hay, Michael Kniss, Jean McSween, John Mingus, Aaron Olszewski, Jennifer Padgett, Sheranda Smith, Joy Solmonson, and Adam Wendel.

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