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American Legion and EducationCounsel Announce Risk-Based Review Model to Protect Student Veterans and Taxpayers

New reviews provide key lessons for accreditors, state authorizers and Department of Education

WASHINGTON, D.C. (Jan. 31, 2022) — Today, the American Legion and EducationCounsel announced a new risk-based review model to protect student veterans and taxpayers and [a comprehensive report](#) demonstrating the effectiveness of these new reviews.

All State Approving Agencies (SAAs) that oversee institutions enrolling GI Bill recipients will for the first time carry out risk-based reviews starting in October 2022, as required by the Isakson and Roe Veterans Health Care and Benefits Improvement Act of 2020.

“Risk-based reviews are a critical example of the federal government taking bipartisan action to protect student veterans and taxpayers, and this pilot shows that such a system works,” said James LaCoursiere, American Legion Veterans Employment and Education Commission chairman. “That’s why the National Executive Committee of The American Legion unanimously supported a resolution to promptly adopt and deploy risk-based reviews to protect our veterans and the integrity of the GI Bill.”

[Read the overview of key findings and policy recommendations here](#)

The risk-based review model – successfully piloted by six SAAs during the past year – uses publicly available data like completion rates, earnings, rapid changes in enrollment or price, retention and average net price to separate higher risk schools from lower-risk schools. It then prioritizes further oversight to schools showing the highest levels of risk to students and taxpayers. The system uses publicly available data to automate the process of ranking programs in a state from higher to lower risk.

“This pilot has demonstrated that risk-based, outcomes-focused reviews are feasible, effective for regulators and students and can be realistically implemented, right now,” said Nathan Arnold, senior adviser with EducationCounsel. “The evidence from this pilot shows that public data can be used to effectively prioritize limited oversight resources, and this is a model that can be used by accreditors, state authorizers and Department of Education program reviews and enforcement.”

The risk-based review model was jointly designed and piloted by EducationCounsel and the National Association of State Approving Agencies (NASAA) over the past two years. NASAA is the membership organization representing the more than 50 SAAs nationwide that oversee education and training programs for veterans in their respective states.

Veterans and their families have been targeted by risky colleges and other post-secondary training programs because the generous benefits available through the Post-9/11 GI Bill make veterans attractive to unscrupulous providers. The federal government spends over \$12 billion per year for veterans and their families to attend college.

“Risk-based reviews are a game-changer,” said Joe Wescott, legislative liaison for NASAA and former executive director of the North Carolina SAA. “This new model allows staff to focus on protecting students from schools that leave them worse off or are likely to suddenly shut down.”

The pilot SAAs that successfully executed the risk model this past year are also strong supporters of the new reviews, particularly compared to reviews focused on payment compliance. “When I think about compliance surveys compared to the new risk-based process, it felt like I had blinders on that I’ve finally been able to take off,” said Michelle Hill, President of NASAA and a participant in the pilot during her tenure with the Nevada SAA.

With a current membership of nearly 1.8 million wartime veterans, [The American Legion](#), was founded in 1919 on the four pillars of a strong national security, veterans affairs, Americanism, and youth programs. Legionnaires work for the betterment of their communities through more than 12,000 posts across the nation.

[EducationCounsel](#) is a mission-based education consulting firm that combines experience in policy, strategy, law, and advocacy to drive significant improvements in the U.S. education system.

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