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Flight Training Under the GI Bills: Frequently Asked Questions

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Flight Training Under the GI Bills: Frequently Asked Questions

Over the past several decades, military veterans have demonstrated interest in pursuing flight training. Flight training provides the instruction and experience required for individuals to meet Federal Aviation Administration (FAA) certification requirements to fly aircraft. The GI Bills provide educational assistance to individuals and their family members pursuing approved programs of education in exchange for an individual's service in the uniformed services. The programs of education must meet a variety of requirements to be approved for GI Bill purposes. Flight training programs have some unique approval requirements. Since 1945, Congress and the Administrations have modified aspects of GI Bill coverage of flight training including approval requirements, GI Bill participant eligibility, and payments, in response to abuses, pilot shortages, and the veteran interest in and high costs of such training.

This report answers frequently asked questions about the pursuit of flight training under the GI Bills, including program approval, individual eligibility, benefit levels, and related historical modifications to the GI Bills. Generally, GI Bill-eligible individuals may use their benefits to pursue approved flight training; however, there are differences in the eligibility and benefit levels depending on the flight training provider and the particular GI Bill. There is a distinction between flight training programs provided by an institution of higher learning (IHL) toward the degree the individual is pursuing and flight training provided by flight schools, which is classified as vocational flight training. Generally, policies for IHL flight training are similar to those for other degree programs at IHLs, whereas vocational flight training is subject to additional restrictions on approval, eligibility, and payments.

GI Bill-eligible individuals may pursue a degree that requires flight training at a qualified IHL. In addition, if the required flight training is under the control of the IHL, the individual may pursue a private pilot certificate. Under the Post-9/11 GI Bill, such individuals may be eligible for separate payments for tuition and fees, housing, and books and supplies in a manner similar to other individuals pursuing approved programs at IHLs. The basic tuition and fees payment may cover in-state tuition and fee charges at public IHLs and may provide up to \$27,120.05 at a private IHL in academic year (AY) 2023-2024. The monthly housing stipend takes into consideration cost of living differences between IHL locations. The books and supplies stipend does not exceed \$1,000 annually. Under the Survivors' and Dependents' Educational Assistance program (DEA), Montgomery GI Bill-Selected Reserve (MGIB-SR), and Montgomery GI Bill-Active Duty (MGIB-AD), eligible individuals may receive a monthly allowance intended to provide for subsistence, tuition and fees, supplies, books, and/or equipment. The maximum allowance differs for each GI Bill.

GI Bill-eligible individuals may pursue vocational flight training at a pilot school such as those located at airports. To be eligible, the individual must already have a private pilot certificate and a medical certificate. One of the primary reasons that a private pilot certificate is required is related to its avocational or recreational nature. Under the Post-9/11 GI Bill, such individuals may be eligible for up to \$15,497.15 per flight program or academic year (whichever ends first) to cover eligible tuition and fee charges for completed training in AY2023-2024. Under the MGIB-SR and MGIB-AD, an individual may receive up to 60% of the actual and eligible charges for completed training. Individuals may not receive DEA benefits for the pursuit of vocational flight training.

Statutory provisions generally limit GI Bill payments to the curriculum or courses necessary to fulfill the requirements for the attainment of a predetermined and identified educational, professional, or vocational objective. Generally, the U.S. Department of Veterans Affairs (VA) will not pay educational assistance for enrollment in any course that is not a required part of the approved program of education. For example, GI Bill participants pursuing a degree cannot include elective courses beyond those required for the degree. GI bill payments do not cover charges associated with flight hours that exceed the maximum number of flight hours specified in the program approval or with aircraft that are more expensive than the aircraft specified in the program approval.

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What are the GI Bills?

The GI Bills are a set of federal programs that authorize educational assistance benefits for veterans and servicemembers and their family members.¹ The benefits are generally provided in exchange for service in the uniformed services. They encourage recruitment and retention in the uniformed services and facilitate readjustment to the civilian workforce following such service. GI Bill benefits provide educational assistance to eligible individuals pursuing approved educational programs, including flight training. The U.S. Department of Veterans Affairs (VA) currently pays educational benefits under four GI Bills (shown in order of the highest to the lowest levels of participation in FY2022):²

- the Post-9/11 GI Bill—over two-thirds of GI Bill participants,
- the Survivors' and Dependents' Educational Assistance (DEA)—almost one-quarter of GI Bill participants,
- the Montgomery GI Bill-Selected Reserve (MGIB-SR)—fewer than 5% of GI Bill participants, and
- the Montgomery GI Bill-Active Duty (MGIB-AD)—fewer than 5% of GI Bill participants.³

While the majority (61%) of GI Bill participants pursue undergraduate programs at four-year colleges, participants also pursue vocational/technical/non-college degree programs (15%), programs at two-year colleges (14%), graduate programs (9%), and on-the-job and apprenticeship training (1%).⁴

What is flight training?

Flight training provides the instruction and experience required for individuals to achieve a pilot certificate (also referred to as a license).⁵ There are several different types of pilot certificates, ranging from student pilot to airline transport pilot. The types of pilot certification are described in **Table 1**, in the general order in which they are pursued.

To achieve a pilot certificate, individuals need to meet eligibility, training and experience, and testing requirements. Flight training is available at Federal Aviation Administration (FAA)-approved flight schools and institutions of higher learning (IHLs). FAA-approved flight schools

¹ For more a more detailed description of the GI Bills, see CRS Report R42785, *Veterans' Educational Assistance Programs and Benefits: A Primer*.

² U.S. Department of Veterans Affairs, FY2024 Budget Submission, p. VBA-199.

³ Some participants may receive benefits from more than one GI Bill; see U.S. Department of Veterans Affairs, FY2024 Budget Submission, p. VBA-199.

⁴ U.S. Department of Veterans Affairs, Veterans Benefits Administration, *Annual Benefits Report Fiscal Year 2022*, February 2023.

⁵ Pilot certificates are issued in accordance with 14 C.F.R., Part 61.

are schools or entities with a FAA pilot school certificate, grant of exemption letter, or training center certificate.⁶ IHLs are primarily degree-granting colleges and universities.⁷

Table 1. Types of Pilot Certificates
(in the general order in which they are pursued)

Certificate	Description
Student Pilot	This certificate is necessary to begin pilot training to work toward a recreational, sport, or private pilot certificate under the direct supervision of a flight instructor. To be eligible for a student-pilot certificate, an applicant must hold at least a third-class medical certificate, which must be obtained before flying an aircraft solo (i.e., without a flight instructor on board).
Recreational Pilot	This certificate limits pilots to staying within 50 nautical miles of their departure airport unless other conditions are met, limits them to no more than one passenger, and restricts them from flying at night or when air traffic control communications are required.
Sport Pilot	This certificate allows pilots to fly light-sport aircraft during the day in clear weather while maintaining visual contact with the ground, and carry a passenger.
Private Pilot	This certificate allows pilots to fly solo and carry passengers in any aircraft for which they are qualified, but not to fly for compensation.
Commercial Pilot	This certificate allows pilots to be compensated for flying and to be hired for a variety of aviation jobs (e.g., air ambulance, agricultural spraying, corporate and charter flights), including first officer positions with airlines, and is applicable to an aircraft category and rating. To qualify for a commercial pilot certificate, applicants must hold a second-class medical certificate based on a medical exam confirming that their vision is correctable to 20/20 and that no physical or mental conditions exist that could impair their performance. ^a
Flight Instructor	This certificate allows individuals to teach flight training and is unique to the type of aircraft (e.g., single-engine, multi-engine fixed wing). ^b To be eligible for the certificate, an applicant must hold at least a third-class medical certificate. Flight instructors may earn income and accrue hours toward the airline transport pilot certificate.
Airline Transport Pilot	This certificate is the highest level of pilot certification, requires the highest amount of cumulative flight time (1,500 hours for an unrestricted certificate ^b), and is necessary to qualify as a captain for an airline. To be eligible for the certificate, an applicant must hold at least a first-class medical certificate and a commercial pilot certificate with an instrument rating, ^c and meet all additional aeronautical experience and training requirements.
Ground School Instructor	This certificate authorizes individuals to provide ground training in aeronautical knowledge areas. The certification may be earned in basic, advanced, and instrument ratings. ^c

Source: U.S. Department of Transportation, Federal Aviation Administration, *Pilot’s Handbook of Aeronautical Knowledge*, FAA-H-8083-25C, 2023; 14 C.F.R., Part 61; and U.S. Government Accountability Office, *Collegiate Aviation Schools: Stakeholders’ Views on Challenges for Initial Pilot Training Programs*, GAO-18-403, May 2018.

a. See U.S. Department of Labor, Bureau of Labor Statistics, *Occupational Outlook Handbook*, Airline and Commercial Pilots, <https://www.bls.gov/ooh/transportation-and-material-moving/airline-and-commercial-pilots.htm> (visited August 15, 2023).

⁶ Under 38 C.F.R. §21.4263(b), flight schools are either (1) schools with an FAA-issued pilot school certificate or provisional pilot school certificate specifying each course approved under 14 C.F.R., Part 141; (2) entities permitted to offer pilot training by a flight simulator instead of an actual aircraft under an FAA-issued grant of exemption letter under 14 C.F.R., Part 61; or (3) schools or entities with an FAA-issued training center certificate under 14 C.F.R., Part 142.

⁷ 38 U.S.C. §3452(f).

- b. The multi-engine rating allows individuals to operate fixed-wing aircraft with multiple engines. Lora Chajka-Cadin and Catherine L. Taylor, *Forces to Flyers Pilot Training Demonstration Evaluation and Research on Pilot Career Pathways*, U.S. Department of Transportation, DOT-VNTSC-OSTR-21-01, December 2020, p. 38.
- c. The instrument rating is required for low visibility conditions such as flying at night or flying during inclement weather. The rating may be added on to a private pilot or commercial pilot certificate.

What are the GI Bill approval requirements for flight training programs?

Flight programs must meet general requirements that apply to all GI Bill-eligible programs as well as requirements specific to flight training.

Programs of education are approved for GI Bill purposes by a state approving agency (SAA) or the VA. A program of education, including flight training, must demonstrate that it meets the statutory and regulatory requirements and standards established in VA guidance. The requirements and standards relate to the adequacy of the resources provided by the educational institution or training establishment (ETI), program quality, and instructor qualifications; the policies and administrative capabilities of the ETI; and other criteria intended to avoid waste, fraud, and abuse of federal funds. For example, the ETI must maintain records regarding student academic progress and ETI advertising practices, and the program must not be avocational or recreational in nature. Under the 85/15 rule, the percentage of students in each program that are financially supported by the VA or ETI cannot exceed 85% of the total students unless the program is exempt or waived.⁸ Under the two-year rule, the location of a private ETI must have been under substantially the same operation for at least two years for its nondegree program(s) to be approvable.⁹ If the ETI contracts out a portion of the training, the courses offered by the contractor must also be approved for GI Bill purposes.¹⁰ In addition, there are differences in the approval standards for degree programs at public and private nonprofit, accredited IHLs; accredited private for-profit ETIs; and non-accredited ETIs.

Statutory and regulatory provisions and VA guidance also establish additional criteria related specifically to flight training. The requirements differ for vocational or IHL flight training. (See the **Appendix** for historical changes to the flight training-specific GI Bill approval requirements.) As part of the GI Bill approval process, VA regulations and guidance require ETIs offering flight training to establish and document several standards and limitations that are used to determine GI Bill payment amounts.

Approval Requirements for Vocational Flight Training Programs

In general, vocational flight training may be approved for GI Bill purposes if it is generally accepted as necessary for the attainment of a recognized vocational objective in the field of aviation and it is FAA approved.¹¹ In addition, for MGIB-SR the flight courses that constitute the program of education must meet FAA standards.¹² For the Post-9/11 GI Bill and MGIB-AD, the

⁸ 38 U.S.C. §3860A(d) and 38 C.F.R. §21.4201.

⁹ 38 U.S.C. §3860A(e) and 38 C.F.R. §21.4251.

¹⁰ 38 U.S.C. §3680A(f)(1) and 38 C.F.R. §21.4233(e).

¹¹ U.S. Department of Veterans Affairs, "Post-9/11 Improvements, Fry Scholarship, and Interval Payments Amendments," 88 *Federal Register* 33684, May 24, 2023. A vocational objective is one that leads to an occupation. It may include educational objectives essential to prepare for the chosen occupation (38 C.F.R. §21.5021(s)).

¹² U.S. Department of Veterans Affairs, "Post-9/11 Improvements, Fry Scholarship, and Interval Payments Amendments," 88 *Federal Register* 33684, May 24, 2023.

flight program must be deemed approved, meaning it is exempt from many of the general approval requirements.¹³ Vocational flight training approved by the FAA and offered by a certified pilot school possessing a valid FAA pilot school certificate or provisional pilot school certificate under Title 14, Part 141, of the Code of Federal Regulations is deemed approved.¹⁴

Additional restrictions apply:

- the flight school must be in the United States¹⁵;
- ground school must be in residence¹⁶; and
- student, recreational, and private pilot certificate training as well as test courses may not be approved for vocational flight training.¹⁷

VA regulations establish the maximum approvable vocational flight training hours for most activities included in flight training programs.¹⁸ In general, with a few exceptions, the maximum hours allowed for flight training are the minimum number of hours required by the FAA.¹⁹ Vocational flight training program approvals must document the type of aircraft (or flight simulator), the hourly rates for aircraft, the maximum number of required flight training hours for types of flight instruction (e.g., ground or dual flight training), mandatory fee charges, and additional instructional requirements as applicable.²⁰

Approval Requirements for IHL Flight Training Programs

IHL flight training courses must provide credit toward the standard college degree the participant is pursuing at the IHL.²¹ The flight training courses may be offered in-house by the IHL or through a contract with another ETI. To be considered in-house, the course outlines, syllabus, instructors, and aircraft must be under the control of (i.e., owned or paid for by) the IHL. The IHL must be FAA-approved to offer in-house flight training.²² If the contracted entity is an IHL, it

¹³ Programs of education that are deemed approved are exempt from many of the approval requirements except those limitations in 38 U.S.C. §§3675(b)(1) and (b)(2), 3680A, 3684, and 3696. U.S. Department of Veterans Affairs, “Post-9/11 Improvements, Fry Scholarship, and Interval Payments Amendments,” 88 *Federal Register* 33684, May 24, 2023.

¹⁴ U.S. Department of Veterans Affairs, “Post-9/11 Improvements, Fry Scholarship, and Interval Payments Amendments,” 88 *Federal Register* 33696, May 24, 2023.

¹⁵ 38 C.F.R. §21.4263(b).

¹⁶ 21 C.F.R. §21.4267; and U.S. Department of Veterans Affairs, Web Automated Reference Material System, M22-4, Part IX, Chapter 4, Subchapter II, April 19, 1999.

¹⁷ U.S. Department of Veterans Affairs, Web Automated Reference Material System, M22-4, Part IX, Chapter 4, Subchapter II, April 19, 1999.

¹⁸ 38 C.F.R. §21.4263(i). In some circumstances, the maximum number of hours may be increased.

¹⁹ Example exceptions include that the maximum number of approved dual flight training hours is 120% of the FAA’s minimum hourly requirement, and that the maximum approvable hours for preflight briefings and post-flight critiques is 25% of the total hours of flight training. P.L. 102-568 initially set the restricted number of payable solo flying hours to the FAA minimum requirement in response to concerns that students had used solo hours for recreational purposes (U.S. Congress, Senate Committee on Veterans’ Affairs, *Veterans’ Readjustment Benefits Improvement Act of 1992*, to accompany S. 2647, 102nd Cong., 2nd sess., August 12, 1992, S.Rept. 102-379, p. 29).

²⁰ U.S. Department of Veterans Affairs, Web Automated Reference Material System, M22-4, Part IX, Chapter 4, Subchapter II, April 19, 1999; and Montana Office of Public Instruction, State Approving Agency, *Flight School Certifying Officials Handbook*, January 2010.

²¹ 38 C.F.R. §21.4252(c). Flight training that does not lead to a degree and is offered by an IHL is vocational flight training if it meets the vocational flight training requirements and is approved as such.

²² The IHL must be approved under 14 C.F.R., Part 141 or conduct training under 14 C.F.R., Part 61. U.S. Department of Veterans Affairs, *Education Service, School Certifying Official Training, Institutions of Higher Learning with Flight Courses*, National Association of Veterans’ Program Administrators 2019 Conference Presentation.

must be FAA-approved and its courses must be GI Bill approved. If the contracted entity is a flight school, the vocational flight training courses must be GI Bill approved. IHL flight training offered by a public or private nonprofit IHL may be deemed approved. The program approval must document the number of credit hours, flight objective, the specific number of flight training hours (i.e., flight, ground, and pre/post) required for each course, the type of aircraft, and associated mandatory fees.²³

While the student pilot and test course portions of a degree program may not be approved by the VA, private pilot and recreational pilot training may be included in VA's approval of in-house IHL flight training degree programs.²⁴ The IHL must be FAA-approved to offer in-house flight training.²⁵ This includes in-house IHL flight training under contract to another IHL. Because the degree is the educational objective, the private pilot certificate may be included in IHL flight training.²⁶

Which flight training may be approved for GI Bill purposes?

GI Bill benefits may only be paid to individuals who are pursuing GI Bill-approved programs of education. Statutory and regulatory provisions establish several requirements and standards for programs of education, including flight training, to be approved. Flight training programs must be either *vocational flight training* or *IHL flight training* (see text box).

Types of Flight Training Approvable for GI Bill Purposes

Vocational flight training

FAA-approved flight training that is offered by a FAA-certified pilot school that possesses a valid FAA pilot school certificate and that is generally accepted as necessary for the attainment of a recognized vocational objective in the field of aviation. The GI Bill participant must have a valid private pilot certificate and the appropriate medical certificate.²⁷

IHL flight training

Flight training provided by an accredited IHL for credit toward a standard college degree (i.e., associate's or higher degree) the GI Bill participant is seeking.²⁸

²³ Robert M. Worley II, Director, Education Service, *Compliance and Liaison Advisory 223-15-01*, U.S. Department of Veterans Affairs, September 1, 2015; Robert M. Worley II, Director, Education Service, "NASAA Mid-Winter Training & Business Meeting," Education Service Updates, February 8, 2016; and U.S. Department of Veterans Affairs, *Education Service, School Certifying Official Training, Institutions of Higher Learning with Flight Courses*, National Association of Veterans' Program Administrators 2019 Conference Presentation.

²⁴ 38 C.F.R. §21.4235(f).

²⁵ The IHL must be approved under 14 C.F.R., Part 141 or conduct training under 14 C.F.R., Part 61. U.S. Department of Veterans Affairs, *Education Service, School Certifying Official Training, Institutions of Higher Learning with Flight Courses*, National Association of Veterans' Program Administrators 2019 Conference Presentation.

²⁶ U.S. Department of Veterans Affairs, "Criteria for Approving Flight Courses for Educational Assistance Programs," 63 *Federal Register* 34128, June 23, 1998.

²⁷ 38 U.S.C. §3034(d).

²⁸ 38 U.S.C. §3680A(b) and §3452(g).

Can GI Bill benefits be used at standalone flight schools?

Yes, with limitations. Standalone flight schools are not IHLs and may include schools at an airport or aero clubs. Standalone flight schools offer vocational flight training. The flight school must meet several criteria (see “What are the GI Bill approval requirements for flight training programs?”) including at least one of the following:

- for the Post-9/11 GI Bill, DEA, MGIB-SR, and MGIB-AD, the flight school must have an FAA-issued pilot school certificate or provisional pilot school certificate under 14 C.F.R., Part 141, specifying each course the school is approved to offer;
- for DEA and MGIB-SR, the flight school must have an FAA-issued grant of exemption letter under 14 C.F.R., Part 61 to offer flight simulator training; or
- for DEA and MGIB-SR, the flight school must have an FAA-issued training center certificate under 14 C.F.R., Part 142.²⁹

See the **Appendix** for historical changes in the eligibility of flight schools to provide GI Bill-approved flight training.

Can GI Bill benefits be used to pursue a private pilot certificate?

Yes, in certain circumstances. GI Bill beneficiaries may pursue a private pilot certificate (license) if such training is for credit toward a standard college degree the beneficiary is seeking at an IHL and an IHL is directly providing the training.³⁰

Private pilot certificate training is not eligible for GI Bill benefits when the beneficiary pursues vocational flight training. Likewise, GI Bill benefits are not available for private pilot instruction provided by a flight school under contract to an IHL. See the **Appendix** for the evolution of statutory and administrative restrictions on using GI Bill benefits to pursue a private pilot certificate.

Who is eligible to receive GI Bill benefits for flight training?

To be eligible to receive GI Bill benefits for flight training, an individual must be eligible for an applicable GI Bill and must be pursuing a GI Bill-approved flight training program.³¹ To continue receiving GI Bill benefits, including benefits for flight training, the participant must maintain satisfactory conduct, attendance as required, and progress toward completion of their educational objective. Vocational flight training programs must have approved standards of progress based upon a minimum number of hours of training in a given period.³² The standards of progress for

²⁹ 38 C.F.R. §21.4263(a)-(b) per U.S. Department of Veterans Affairs, “Post-9/11 Improvements, Fry Scholarship, and Interval Payments Amendments,” 88 *Federal Register* 33696, May 24, 2023.

³⁰ The private pilot course may be a prerequisite for the degree or another required flight course (U.S. Department of Veterans Affairs, *Education Service: School Certifying Official Training: Institutions of Higher Learning with Flight Courses*, Presentation at 2019 National Association of Veterans’ Program Administrators Conference).

³¹ For information about individual eligibility for the GI Bills, see CRS Report R42785, *Veterans’ Educational Assistance Programs and Benefits: A Primer*.

³² U.S. Department of Veterans Affairs, Web Automated Reference Material System, M22-4, Part IX, Chapter 4, Subchapter II, April 19, 1999.

IHL flight training programs must define the grading system, satisfactory grade levels, and policies regarding unsatisfactory progress.³³

Requirements to have a valid private pilot certificate and the appropriate medical certificate on the first day of training vary by the type of flight training and training provider. Individuals pursuing vocational flight training must have a valid private pilot certificate and the appropriate medical certificate on the first day of training.³⁴ Individuals pursuing a ground instructor certificate course are not required to have a private pilot certificate.³⁵ Individuals pursuing IHL flight training offered in-house by an IHL are not required to have a private pilot certificate before beginning training (unless the IHL requires it for reasons other than the GI Bills). Individuals pursuing IHL flight training that requires courses offered by a flight school under contract to the IHL must have a valid private pilot certificate and meet the medical requirements on the first day of training.³⁶

Individuals may not receive DEA benefits for the pursuit of vocational flight training.

What GI Bill Benefit Payments Are Available for Flight Training?

GI Bill benefit payments differ by GI Bill and for vocational flight training and IHL flight training. **Table 2** presents the maximum benefit payments available for flight training. Payments are no longer available after individuals use all of their entitlement (see “How is GI Bill entitlement charged for flight training?”). Benefits for vocational flight training are paid (reimbursed) based on the actual charges for completed training. Benefits for IHL flight training are paid like other IHL payments for the particular GI Bill. Degree programs containing flight training at IHLs are treated the same as any other degree program because the flight training that is part of the degree program is measured in the same manner as other required credit-bearing courses.³⁷

Benefits for vocational flight training are available under the Post-9/11 GI Bill, MGIB-SR, and MGIB-AD but not DEA.³⁸ Benefits for IHL flight training are available through the Post-9/11 GI Bill, DEA, MGIB-SR, and MGIB-AD.

Post-9/11 GI Bill Payments for Vocational Flight Training

Under the Post-9/11 GI Bill, individuals enrolled in vocational flight training receive no more than the annual flight training cap per flight program or academic year, whichever ends first (e.g., up to \$15,497.15 for the approved charges of net tuition and mandatory fees for August 1, 2023,

³³ U.S. Department of Veterans Affairs, *School Certifying Official Handbook (On-line)*, Revision 6.7, April 5, 2023.

³⁴ 38 C.F.R. §21.4235(a).

³⁵ 38 C.F.R. §21.4235(a) and (c)(4). Becoming a qualified ground instructor is considered a vocational objective (U.S. Department of Veterans Affairs, “Criteria for Approving Flight Courses for Educational Assistance Programs,” 63 *Federal Register* 34128, June 23, 1998).

³⁶ 38 C.F.R. §21.4235(a) establishes the need for a second-class medical certificate for courses other than those leading to an Airline Transport Pilot (ATP) certificate and a first-class medical certificate for courses leading to an ATP certification.

³⁷ U.S. Department of Veterans Affairs, *Education Service, School Certifying Official Training, Institutions of Higher Learning with Flight Courses*, National Association of Veterans’ Program Administrators 2019 Conference Presentation.

³⁸ 38 U.S.C. §3523(b).

to July 31, 2024) based on the approved charges for their program and actual training completed.³⁹ Net tuition and mandatory fees are the actual and approved charges for in-state tuition and mandatory fees assessed by the institution less any waiver of, or reduction in, tuition and fees and any scholarship or other federal, state, institutional, or employer-based aid or assistance (other than loans and funds provided under Section 401(b) of the Higher Education Act of 1965) that is provided directly to the institution and specifically designated for the sole purpose of defraying tuition and fees.⁴⁰ The actual Post-9/11 GI Bill tuition and fee payment is reduced for individuals below the 100% benefit level. The benefit levels, between 50% and 100%, are dependent on an individual's period of qualifying active-duty service or other eligibility characteristics.⁴¹

MGIB-SR and MGIB-AD Payments for Vocational Flight Training

Under MGIB-SR and MGIB-AD, individuals enrolled in vocational flight training receive 60% of the approved charges for an approved flight training program based on actual training completed.⁴²

Post-9/11 GI Bill Payments for IHL Flight Training

Under the Post-9/11 GI Bill, individuals enrolled in IHL flight training generally receive a monthly housing stipend, books and supplies stipend, and tuition and fees payment.⁴³ The monthly housing stipend takes into consideration differences in the rental housing market and the IHL's location. The actual Post-9/11 GI Bill housing stipend is reduced for less-than-full-time pursuit, eliminated for half-time or less-than-half-time pursuit, reduced for partial months of pursuit, reduced for individuals below the 100% benefit level, reduced for individuals enrolled exclusively through distance learning, and eliminated for participants on active duty. The maximum books and supplies stipend is \$1,000 annually, but the actual amount is reduced for less-than-full-time pursuit and for individuals below the 100% benefit level. The tuition and fees payment at the full (100%) benefit level is either

- at a public IHL, net tuition and mandatory fees based on the student's academic term enrollment as submitted on the enrollment certification; or
- at a private IHL, no more than the private IHL tuition and fees cap in a given year (e.g., a maximum of \$27,120.05 for August 1, 2023, to July 31, 2024) based on the student's academic term enrollment as submitted on the enrollment certification.

³⁹ 38 U.S.C. §3313(g)(3)(C). Additional payments are available for tutorial assistance, licensing and certification test fees, national test fees, relocation and travel assistance, and supplemental assistance. For more information regarding Post-9/11 GI Bill benefit payments and benefit levels, see CRS Report R42755, *The Post-9/11 GI Bill: A Primer*.

⁴⁰ U.S. Department of Veterans Affairs, "Post-9/11 Improvements, Fry Scholarship, and Interval Payments Amendments," 88 *Federal Register* 33672-33720, May 24, 2023.

⁴¹ For example, eligible individuals with at least 90 days, but less than 6 months, of active-duty service are at the 50% benefit level and eligible individuals with at least 36 months of active duty service are at the 100% benefit level.

⁴² 38 U.S.C. §3032(e)(1).

⁴³ Additional payments are available for the Yellow Ribbon program, tutorial assistance, licensing and certification test fees, national test fees, relocation and travel assistance, and supplemental assistance. For more information regarding Post-9/11 GI Bill benefit payments and benefit levels, see CRS Report R42755, *The Post-9/11 GI Bill: A Primer*.

The tuition and fees payments are the same regardless of whether the IHL provides the flight training or contracts with a flight school to provide it. The actual Post-9/11 GI Bill tuition and fees payment is reduced for individuals below the 100% benefit level.

DEA, MGIB-SR, and MGIB-AD Payments for IHL Flight Training

Under DEA, MGIB-SR, and MGIB-AD, individuals enrolled in IHL flight training receive the regular monthly assistance allowance for IHL training (e.g., a maximum of \$2,358.00 for each full month of full-time enrollment under MGIB-AD for October 1, 2023, to September 30, 2024 [see **Table 2**]).⁴⁴ The monthly educational assistance allowance is intended to help meet, in part, the expenses of such individuals’ subsistence, tuition, fees, supplies, books, equipment, and other educational costs. The actual monthly subsistence allowance is reduced for less-than-full-time enrollment, partial months of pursuit, and MGIB-AD participants at the reduced two-year rate. There are two MGIB-AD benefit levels: the full rate for individuals whose obligated period of active duty was three years, and a reduced two-year rate for individuals whose obligated period of active duty was two years.

Table 2. Maximum GI Bill Benefit Payments for Flight Training by GI Bill, 2023-2024

GI Bill	Maximum Vocational Flight Training Benefit	Maximum IHL Flight Training Benefit
Post-9/11 GI Bill	For tuition and fees, the lesser of net ^a actual and eligible ^b tuition and fee charges or \$15,497.15 ^{c,d} per year or program, whichever ends first No housing allowance No books and supplies stipend	For tuition and fees, at a public IHL, actual net ^a in-state tuition and fee charges at a private IHL, the lesser of net ^a tuition and fee charges or \$27,120.05 ^{c,d} per year ^e For housing, \$4,644 ^{c,f} per month For books and supplies, \$1,000 per year
Survivors’ and Dependents’ Educational Assistance (DEA) program	\$0	\$1,488.00 allowance per month ^g
Montgomery GI Bill—Selected Reserve (MGIB-SR)	60% of the institution’s actual and eligible ^b charges for completed training	\$466.00 allowance per month ^g
Montgomery GI Bill—Active Duty (MGIB-AD)	60% of the institution’s actual and eligible ^b charges for completed training	\$2,358.00 allowance per month ^g

Source: U.S. Department of Veterans Affairs, Education and Training, Rate Tables, https://www.benefits.va.gov/GIBILL/resources/benefits_resources/rate_tables.asp; U.S. Department of Veterans Affairs, GI Bill Comparison Tool, <https://www.va.gov/education/gi-bill-comparison-tool/>.

Notes: The payment amounts received by individuals may be reduced depending on their duty status, rate of pursuit or enrollment rate, benefit level, and other circumstances. Payments are unavailable to individuals who have used all of their entitlement (see the “How is GI Bill entitlement charged for flight training?” section).

- a. Net tuition and fee charges are actual tuition and fee charges less waivers, reductions, or qualifying aid and scholarships.
- b. Actual charges are the charges that the ETI has billed or will bill the student for training that was previously provided. Eligible charges are charges for flight training as specified within the GI Bill program approval.

⁴⁴ 38 U.S.C. §3015(a).

- c. These rates are effective August 1, 2023, to July 31, 2024.
- d. The maximum amount increases each year to account for the increasing cost of higher education.
- e. In addition to these base Post-9/11 GI Bill tuition and fees benefits, the Yellow Ribbon Program may cover a portion of the remaining net tuition and fees charges for eligible individuals at participating IHLs.
- f. The amount varies by location and is based on an annual survey of actual median current market rent, average utilities, and average renter's insurance in local civilian housing markets.
- g. The maximum amount is applicable for October 1, 2023, to September 30, 2024. The maximum amount increases each year to account for inflation.

Can housing be covered through GI Bill flight training benefits?

Yes, under certain circumstances (see **Table 2**). Under the Post 9/11 GI bill, participants pursuing IHL flight training are eligible for a monthly housing stipend if their rate of pursuit is more than half-time.⁴⁵ For the DEA, MGIB-SR, and MGIB-AD, participants enrolled at least half-time are eligible for the monthly educational assistance allowance, which is intended to help meet, in part, the expenses of such individual's subsistence (food and shelter), tuition, fees, supplies, books, equipment, and other educational costs.

GI Bill benefits do not provide assistance for housing to participants pursuing vocational flight training and to participants enrolled less-than-half-time in IHL flight training. Benefits for vocational flight training provide reimbursement for tuition and fee charges. Post-9/11 GI Bill participants whose rate of pursuit is half-time or less are not eligible for the monthly housing stipend. For the DEA, MGIB-SR, and MGIB-AD, participants enrolled less than half-time are eligible for a monthly educational assistance allowance that does not exceed tuition and fees charges.

What flight training costs may an individual incur above those covered by the GI Bill?

By some estimates in recent years, the flight training required to achieve a private pilot certificate, instrument rating,⁴⁶ commercial pilot certificate with a multi-engine rating,⁴⁷ certified flight instructor certificate, and commercial flight instructor certificate with an instrument rating may cumulatively cost approximately \$62,000, which does not include living expenses; books; insurance; or, for degree-seekers, the tuition and fees for courses that are not flight training.⁴⁸

Statutory provisions generally limit GI Bill payments to the curriculum or courses necessary to fulfill the requirements for the attainment of a predetermined and identified educational, professional, or vocational objective.⁴⁹ GI Bill participants are only eligible for benefits for

⁴⁵ Rate of pursuit is the percentage of credits in which an individual is enrolled compared to the full-time number of credits. For example, the rate of pursuit for an individual enrolled in 9 credits in a standard-length term, assuming the educational institution considers 12 credits to be full time, is 80% ($9 \div 12$, rounded to the nearest tenth).

⁴⁶ The instrument rating is required for low visibility conditions such as flying at night or flying during inclement weather. The rating may be added on to a private pilot or commercial pilot certificate.

⁴⁷ The multi-engine rating allows individuals to operate fixed-wing aircraft with multiple engines. Lora Chajka-Cadin and Catherine L. Taylor, *Forces to Flyers Pilot Training Demonstration Evaluation and Research on Pilot Career Pathways*, U.S. Department of Transportation, DOT-VNTSC-OSTR-21-01, December 2020, p. 38.

⁴⁸ Lora Chajka-Cadin and Catherine L. Taylor, *Forces to Flyers Pilot Training Demonstration Evaluation and Research on Pilot Career Pathways*, U.S. Department of Transportation, DOT-VNTSC-OSTR-21-01, December 2020, p. 41.

⁴⁹ 38 U.S.C. §§3034(d), 3241(b), 3452(b) and 3501(5).

pursuit of an approved program of education.⁵⁰ Generally, the VA will not pay educational assistance for enrollment in any course that is not a required part of the program of education.⁵¹ Only courses that satisfy the program requirements as specified in the approval and outlined by the curriculum guide or school catalog can be certified for VA purposes. If a student takes a course that does not fulfill a program requirement, it cannot be certified for VA purposes.⁵²

GI bill benefit payments do not cover the following charges associated with vocational and IHL flight training:

- private pilot training provided by a flight school;
- flight hours that exceed the maximum number of flight hours specified in the program approval even if a participant requires additional hours to master a specific skill and gain proficiency needed to take flight tests⁵³;
- aircraft that are more expensive than the aircraft specified in the program approval⁵⁴;
- hours of IHL flight training certified for an academic term but flown after the end of the academic term⁵⁵;
- flight training courses that are not required for the approved program;
- IHL flight training courses taken as required electives, unless the courses are specifically required for the participant's degree⁵⁶;
- audiovisual, home study, or personal computer ground school course/training because all ground school training must be in residence⁵⁷; and
- books, supplies, and lodging associated with vocational flight training.⁵⁸

The courses and training offered by a flight school may not necessarily align with the maximum allowable hours and can therefore present additional costs to a trainee. In addition, an individual may use all of their GI Bill entitlement prior to achieving their flight training objective. (For limits on GI Bill entitlement, see the “How is GI Bill entitlement charged for flight training?” section.) (See the **Appendix** for discussion of the historical concerns that led to the restrictions on which flight training costs are and are not covered by GI Bill payments.)

⁵⁰ 38 U.S.C. §§3015, 3313(a), 3531, and 3535.

⁵¹ 38 C.F.R. §§21.3130(c)(2), 21.7122(b), and 21.7622(b).

⁵² U.S. Department of Veterans Affairs, *School Certifying Official Handbook (On-line)*, Revision 6.7, April 5, 2023.

⁵³ U.S. Department of Veterans Affairs, *IHLs with Contracted Flight Programs*, School Certifying Official Webinar, December 14, 2015, p. 8.

⁵⁴ 38 C.F.R. §21.4263(k).

⁵⁵ U.S. Department of Veterans Affairs, *IHLs with Contracted Flight Programs*, School Certifying Official Webinar, December 14, 2015, p. 8.

⁵⁶ U.S. Department of Veterans Affairs, *School Certifying Official Handbook (On-line)*, Revision 6.7, April 5, 2023.

⁵⁷ 38 C.F.R. §21.4263(h)(ii); and U.S. Department of Veterans Affairs, Web Automated Reference Material System, M22-4, Part IX, Chapter 4, Subchapter II, April 19, 1999.

⁵⁸ U.S. Department of Veterans Affairs, Web Automated Reference Material System, M22-4, Part IX, Chapter 4, Subchapter II, April 19, 1999; and 38 C.F.R. §21.4263(j)(1).

How are GI Bill flight training payments made?

The processes for providing flight training benefit payments differ depending on the GI Bill and type of flight training. The VA calculates payment amounts based on enrollment certifications submitted by ETIs and participants. Participants certify their enrollment to VA monthly.⁵⁹

Payment for Vocational Flight Training

GI Bill participants are reimbursed for eligible vocational flight training charges. Before or at the start of vocational flight training, the school certifies to the VA the name of the flight training program, credit for previous training, the maximum number of hours of instruction in the program, the total charges, that the participant has a private pilot certificate, and that the school has a copy of the appropriate medical certificate.⁶⁰ At the beginning of each month, the flight school certifies to the VA the hours and associated charges for each type of flight instruction completed in the prior month and the cumulative hours completed for each type of instruction through the prior month.⁶¹ The certification includes a detailed breakdown of the training received: begin/end dates, types of flight instruction, number of hours of actual flight training, reimbursement rate and charges, and aircraft.⁶² The VA reimburses the participant for the eligible charges, while excluding those charges that may be ineligible based on the approval documentation. For the Post-9/11 GI Bill, the VA provides a lump sum payment directly to the ETI on behalf of the individual for the approved charges for their program based upon monthly certification(s) of actual training completed.⁶³ Individuals may not receive DEA benefits for the pursuit of vocational flight training. Under MGIB-SR and MGIB-AD, individuals enrolled in vocational flight training receive payments based on actual training completed each month as documented on the monthly certifications.⁶⁴

Payment for IHL Flight Training

GI Bill participants pursuing flight training as part of a degree program at an IHL receive payments in the same way as other GI Bill participants pursuing education at an IHL. Flight courses are certified in credit hours.⁶⁵ For example, a degree that includes a commercial pilot certificate would typically include one or more credit-bearing academic courses and one or more credit-bearing flight labs. Students cannot be certified for more hours than are shown in the

⁵⁹ U.S. Department of Veterans Affairs, “Post-9/11 Improvements, Fry Scholarship, and Interval Payments Amendments,” 88 *Federal Register* 33692, May 24, 2023.

⁶⁰ U.S. Department of Veterans Affairs, *VA ENROLLMENT CERTIFICATION (VA FORM 22-1999)*, August 2022.

⁶¹ U.S. Department of Veterans Affairs, *MONTHLY CERTIFICATION OF FLIGHT TRAINING*, VA FORM 22-6553c, September 2022.

⁶² 38 C.F.R. §21.4203(g); and U.S. Department of Veterans Affairs, Enrollment Manager Quick Start Guide: Flight, downloaded from <https://benefits.va.gov/gibill/docs/guides/flight-quick-start-guide.pdf> on June 20, 2023.

⁶³ U.S. Department of Veterans Affairs, “Post-9/11 Improvements, Fry Scholarship, and Interval Payments Amendments,” 88 *Federal Register* 33672-33720, May 24, 2023.

⁶⁴ 38 U.S.C. §3032(e)(1); and email from U.S. Department of Veterans Affairs to CRS, July 25, 2023.

⁶⁵ U.S. Department of Veterans Affairs, *Education Service, School Certifying Official Training, Institutions of Higher Learning with Flight Courses*, National Association of Veterans’ Program Administrators 2019 Conference Presentation.

course description and program approval.⁶⁶ The flight training is not reported through monthly certifications as is the case at flight schools.

For the Post-9/11 GI Bill, the IHL generally makes two enrollment certifications for each academic term. Before the term begins or early in the term, the IHL certifies expected enrollment. The VA provides payments for the housing stipend and books and supplies stipend to each participant during the first week of the month for the prior month's pursuit based on the first certification. Within approximately 60 days after the start of the term, the IHL certifies net tuition and mandatory fees for all academic coursework, including credit-bearing aviation courses and associated fees for the flight training required for each aviation course.⁶⁷ The VA issues a lump sum tuition and fees payment to the IHL for the academic term.⁶⁸

For DEA, MGIB-SR, and MGIB-AD, the IHL certifies the participant's type of training, program of education, and courses before or early in each academic term, and the VA pays the educational assistance allowance to the participant directly during the first week of each month for the prior month's enrollment.⁶⁹

How is GI Bill entitlement charged for flight training?

All of the GI Bills provide eligible persons an initial entitlement to educational assistance. This initial entitlement, usually 36 months (or its equivalent in part-time educational assistance), is measured in months and days.⁷⁰ A dollar value is also associated with each month and day of entitlement. Most educational assistance payments use a portion of the entitlement based on the training period for which the payment was made or in proportion to the dollar value associated with each month and day of entitlement. An individual's initial entitlement less the individual's used entitlement is referred to as remaining entitlement. In general, and unless excepted, eligible persons are no longer eligible for assistance under a particular GI Bill once the entitlement is exhausted.⁷¹

⁶⁶ U.S. Department of Veterans Affairs, *Education Service, School Certifying Official Training, Institutions of Higher Learning with Flight Courses*, National Association of Veterans' Program Administrators 2019 Conference Presentation.

⁶⁷ The second certification is required for IHLs with a drop/add period no later than 30 days after the end of the drop/add period or 60 days from the first day of the term, whichever occurs first. The second certification for IHLs without a drop/add period is required no less than 30 days and no more than 60 days after the term begins.

⁶⁸ U.S. Department of Veterans Affairs, "Post-9/11 Improvements, Fry Scholarship, and Interval Payments Amendments," 88 *Federal Register* 33712, May 24, 2023. If a student fails to complete the certified and required flight hours in a course during the academic term, the student receives an incomplete (U.S. Department of Veterans Affairs, VBA Quarterly Education Service Webinar, December 3, 2014). The incomplete may be resolved as a punitive or nonpunitive grade. A punitive grade is used in determining the student's overall progress toward completion of the school's requirements for graduation. The VA does not pay for a course in which a student receives a nonpunitive grade unless there are mitigating circumstances (U.S. Department of Veterans Affairs, *School Certifying Official Handbook (On-line)*, Revision 6.7, April 5, 2023).

⁶⁹ Email from U.S. Department of Veterans Affairs to CRS, July 25, 2023.

⁷⁰ Post-9/11 GI Bill participants using transferred entitlement might have less than 36 months.

⁷¹ For exceptions, see 38 U.S.C. §§3013(f), 3031(f), 3231(a)(5), 3312(c), 3511(a)(2), 3512(a)(7), and 3699(c).

Entitlement Charges for Vocational Flight Training

For vocational flight training under the Post-9/11 GI Bill, the number of months and days of entitlement charged is determined by dividing the total amount paid by one-twelfth of the maximum vocational flight training payment for the academic year (see **Table 2**).⁷² For example, if a Post-9/11 GI Bill participant at the 100% benefit level is reimbursed \$5,000 in May 2024 for vocational flight training costs, the entitlement charge would be 3.87 months ($\$5,000 / (\$15,497.15 / 12)$).

For vocational flight training under the MGIB-SR and MGIB-AD, the number of months of entitlement charged is in proportion to the monthly full-time allowance for training at an IHL. The entitlement charge is determined by dividing the amount of the flight training payment by an amount equal to what the individual would have received in that month for full-time pursuit of IHL training. (The maximum monthly allowances for full-time IHL training are shown in **Table 2**.) For example, if an MGIB-AD participant at the 100% benefit level is reimbursed \$5,000 in May 2024 for vocational flight training costs, the entitlement charge would be 2.12 months ($\$5,000 / \$2,358$).

Individuals may not receive DEA benefits for the pursuit of vocational flight training.

Entitlement Charges for IHL Flight Training

Under the Post-9/11 GI Bill for IHL flight training, participants use entitlement in the same manner as other participants pursuing studies at an IHL. The entitlement used is the percentage of a day equal to the individual's rate of pursuit for each day enrolled and receiving benefits.⁷³ For example, if a Post-9/11 GI Bill participant is enrolled full-time in 12 credits from September 10 through December 15, 2023, the entitlement charge is 3.20 months or 96 days ($96 \text{ days} * 12 / 12$). If a Post-9/11 GI Bill participant is enrolled in 8 credits from September 10 through December 15, 2023, assuming full-time is 12 credits, the entitlement charge is 2.13 months or 64 days ($96 \text{ days} * 8 / 12$).

Under the DEA, MGIB-SR, and MGIB-AD for IHL flight training, participants are charged entitlement in the same manner as other participants pursuing education at an IHL. The entitlement charge is the percentage of a day equal to the individual's enrollment rate for each day enrolled.⁷⁴

What is the employment outlook for pilots?

Commercial and airline pilots are in-demand, with some stakeholders identifying a pilot shortage, but the civil aviation industry can be volatile, fluctuating with economic, political, and international conditions. The U.S. Department of Labor (DOL) estimates that commercial and

⁷² U.S. Department of Veterans Affairs, "Post-9/11 Improvements, Fry Scholarship, and Interval Payments Amendments," 88 *Federal Register* 33679, May 24, 2023.

⁷³ U.S. Department of Veterans Affairs, "Post-9/11 Improvements, Fry Scholarship, and Interval Payments Amendments," 88 *Federal Register* 33700, May 24, 2023.

⁷⁴ Enrollment rates are categories comparing the number of credits in which a student is enrolled to the full-time number of credits. For example, if full-time is 12 credits, students enrolled in 9-11 credits have a three-quarter-time enrollment rate, students enrolled in 6-8 credits have a half-time enrollment rate, and students enrolled in 5 or fewer credits have a less-than-half-time enrollment rate. For DEA and MGIB-AD, less-than-half-time enrollment is charged one-quarter of a day for each day enrolled. U.S. Department of Veterans Affairs, *School Certifying Official Handbook (On-line)*, Revision 6.7, April 5 2023.

airline pilot employment, considered together, will grow by 4%, as fast as the average for all occupations, from 2022 to 2032; for comparison, DOL forecasts that overall employment (i.e., for all occupations) will grow at a rate of 3% over that time period. In order to receive remuneration, pilots must have at least a commercial pilot certificate. Some employers may require or prefer commercial pilot certificate holders to have a degree before employing them. Airline pilots must hold an Airline Transport Pilot (ATP) rating. Additionally, most major airlines give considerable preference to candidates holding at least a bachelor's degree, although there are no federal degree requirements to serve as an airline pilot. The median annual wage for commercial pilots and airline pilots (including co-pilots and flight engineers) was \$103,910 and \$211,790, respectively, in May 2022.⁷⁵

What technical assistance and oversight does the VA provide to GI Bill-approved flight training programs?

Statutory and regulatory provisions establish several mechanisms by which the VA provides technical assistance to GI Bill-approved flight training programs provided by flight schools and IHLs to help them comply with statutory and regulatory requirements and VA policies and guidance. The VA and SAAs conduct reviews of programs of education during which they can provide technical assistance, and as a result of which they can disapprove programs. In addition, the ETI may request technical assistance from the SAA.

Training is required of school certifying officials (SCOs)—the individual(s) at each ETI who are responsible for certifying GI Bill participant enrollments, monitoring student progress, maintaining appropriate records, and making other reports to the VA. Statutory provisions require the VA, in consultation with the SAAs, to establish training requirements for SCOs at educational institutions with at least 20 individuals participating in either a GI Bill or the Veterans Readiness and Employment (VR&E) program. VR&E is a VA-administered program that provides job training and other employment-related services to veterans with service-connected disabilities.⁷⁶ If an educational institution fails to meet the applicable training requirements, the VA may disapprove any course of education offered by the institution. The VA has established required training for all new SCOs at institutions with at least one GI Bill or VR&E participant and mandatory annual training for SCOs at institutions with at least 20 total GI Bill and VR&E participants. The VA has developed several training tracks based on the facility type, including one for SCOs at IHLs with flight programs and one for SCOs at flight schools. SCOs at institutions with fewer than 20 GI Bill and VR&E participants are encouraged to take the appropriate training annually.⁷⁷

⁷⁵ U.S. Government Accountability Office (GAO), *Collegiate Aviation Schools: Stakeholders' Views on Challenges for Initial Pilot Training Programs*, GAO-18-403, May 2018, pp. 2, 12; U.S. Department of Labor, U.S. Bureau of Labor Statistics, *Occupational Outlook Handbook, 2010-11 Library Edition*, Bulletin 2800, Superintendent of Documents, U.S. Government Printing Office, Washington, DC, pp. 787-790; U.S. Department of Labor, U.S. Bureau of Labor Statistics, *Occupational Outlook Handbook, Airline and Commercial Pilots*, <https://www.bls.gov/ooh/transportation-and-material-moving/airline-and-commercial-pilots.htm> (visited September 06, 2023).

⁷⁶ For more information about VR&E, see CRS Report RL34627, *Veterans' Benefits: The Veteran Readiness and Employment Program*.

⁷⁷ U.S. Department of Veterans Affairs websites: School Certifying Official (SCO) Training, as available from https://www.benefits.va.gov/gibill/resources/education_resources/school_certifying_officials/online_sco_training.asp (continued...)

The VA and SAAs conduct reviews, compliance surveys, and risk-based surveys of educational programs to ensure their compliance with applicable requirements. The VA is required, with SAA assistance as needed, to conduct an annual compliance survey (sometimes referred to as an audit) of ETIs offering one or more GI Bill-approved courses if at least 20 GI Bill participants are enrolled in any such courses.⁷⁸ Compliance surveys are intended to ensure enrollment certifications are accurate. They are also intended to ensure ETI staff understand the requirements of the law, regulations, and guidance to prevent violations. The VA, in partnership with the SAAs, is required to conduct risk-based surveys of GI Bill-approved programs as appropriate. In FY2019, public flight programs with prior compliance survey deficiencies were included in the types of programs to prioritize. During the reviews, the VA and SAAs offer technical assistance.

on July 6, 2023; and School Certifying Official Training FAQs, https://www.benefits.va.gov/GIBILL/resources/education_resources/school_certifying_officials/SCO_Training_FAQS.asp.

⁷⁸ 38 U.S.C. §3693. The VA may waive this requirement based on the ETI's record of compliance.

Appendix. History of Flight Training under the GI Bills

Statutory provisions have variously expanded and restricted eligibility to GI Bill benefits for flight training since the WWII GI Bill.⁷⁹ The primary reasons for the limitations have been, and still are, related to the potential avocational or recreational nature of flying, the high amount of benefit payments in comparison to other training, and its perceived value to the participant. These factors have generated a stigma of abuse related to the use of GI Bill benefits for flight training. Complementing the statutory provisions, VA regulations and policy have also limited flight training approvals. Although limitations have been placed on vocational flight training at various times, they have sometimes been relaxed in response to veteran interest or commercial pilot shortages.

Prohibitions on Recreational and Avocational Training Beginning in the 1940s

Originally, under the WWII GI Bill enacted in 1944, the VA was authorized to pay up to \$500⁸⁰ per participant per academic year for tuition and fees. When the \$500 annual cap on tuition and fees benefits was eliminated in 1945,⁸¹ the number of flight schools participating and veterans pursuing flight training increased because the benefit payment could cover the higher training costs.⁸²

By 1949, legislation was enacted to prohibit the use of WWII GI Bill benefits for training of a recreational or avocational nature.⁸³ A major congressional intent of the WWII GI Bill was to help returning veterans adjust to civilian life and the civilian workforce.⁸⁴ However, the VA and the Bureau of the Budget (the predecessor of the Office of Management and Budget) had concluded that a significant number of veterans were pursuing courses of an avocational or recreational nature that included flight training.⁸⁵ A 1948 Bureau of the Budget report determined that the federal cost for such programs, particularly flight training, photography, dancing, and elementary musical instrument courses, outweighed the benefit to veterans and that such courses were in contravention to the purpose of the GI Bill, which was to help veterans transition to the civilian

⁷⁹ The WWII GI Bill, the first GI Bill, was enacted by the Servicemen's Readjustment Act of 1944 (P.L. 78-346).

⁸⁰ In January 1945, \$500 had the same buying power as \$8,403.65 in January 2023 according to the Bureau of Labor Statistics CPI Inflation Calculator (<https://data.bls.gov/cgi-bin/cpicalc.pl>).

⁸¹ See P.L. 79-268.

⁸² U.S. Congress, *House Committee Print No. 210, Report on Education and Training under the Servicemen's Readjustment Act, as amended*, committee print, prepared by Administrator of Veterans' Affairs, 81st Cong., 2nd sess., February 8, 1950, pp. 53, 55.

⁸³ See the Supplemental Independent Offices Appropriation Act, 1949 (P.L. 80-862); 38 U.S.C. §1623.

⁸⁴ U.S. Congress, House Committee of Conference, *Providing Federal Government Aid for the Readjustment in Civilian Life of Returning World War II Veterans*, to accompany S. 1767, 80th Cong., 2nd sess., June 12, 1944, H.Rept. 78-1624, pp. 1, 20.

⁸⁵ Letter from Omar N. Bradley, General, United States Army, Administrator of Veterans' Affairs, to Hon. Edith Nourse Rogers, Chairman, Committee on Veterans' Affairs, House of Representatives, April 23, 1947; U.S. Congress, House Committee on Appropriations, *Supplemental Independent Offices Appropriation Bill, 1949*, to accompany H.R. 6829, 80th Cong., 2nd sess., June 8, 1948, H.Rept. 80-2245, pp. 11-12; and Letter from O.W. Clark (For Carl R. Gray, Jr., Administrator), Veterans' Administration, to Hon. John E. Rankin, Chairman, Committee on Veterans' Affairs, House of Representatives, April 29, 1949.

workforce.⁸⁶ Correspondence from the VA indicated that flight training resulted in disproportionately large GI Bill expenditures and that the majority of flight training beneficiaries were enrolled in basic courses of “doubtful, if any, economic or occupational assistance to the veteran.”⁸⁷

The 1949 prohibition on the use of GI Bill assistance for avocational and recreational courses established that flight training provided in connection with an individual’s present or contemplated occupation was not considered avocational or recreational.⁸⁸ As a result of the prohibition, for vocational flight training and elective flight courses that provide credit toward the pursued degree at an IHL, the VA required medical certification from the Civil Aeronautics Board and affidavits from the veteran and disinterested parties that the training would be useful toward earning a livelihood.⁸⁹ The VA did not require additional proof that flight courses required for the individual’s pursued degree at an IHL were not avocational or recreational.⁹⁰ Subsequent legislation made the proof that the flight training was not avocational or recreational more stringent.⁹¹ The number of flight trainees correspondingly declined from over 124,000 in November 1947 to over 30,000 in October 1949.⁹²

The Korean Conflict GI Bill (P.L. 82-550) enacted in 1952 included provisions intended to limit flight training. The VA was prevented from approving courses that it determined were avocational or recreational in nature unless the individual “submits justification showing that the course will be of bona fide use in the pursuit of [the individual’s] present or contemplated business or occupation.” This provision is currently codified in 38 U.S.C. §3680A(a)(3). Because a private pilot certificate does not qualify an individual to fly for compensation, such training is considered avocational.

Balancing Flight Training Costs and Entitlement Usage Beginning in the 1950s

In addition, the Korean Conflict GI Bill was intended to provide a benefit level sufficient for veterans to be able to pursue and afford expensive flight training while exhausting their entitlement within a short period.⁹³ Veterans in flight training were limited to benefits equal to

⁸⁶ U.S. Congress, House Committee on Appropriations, *Supplemental Independent Offices Appropriation Bill, 1949*, to accompany H.R. 6829, 80th Cong., 2nd sess., June 8, 1948, H.Rept. 80-2245, pp. 11-12; and Letter from O.W. Clark (For Carl R. Gray, Jr., Administrator), Veterans’ Administration, to Hon. John E. Rankin, Chairman, Committee on Veterans’ Affairs, House of Representatives, April 29, 1949.

⁸⁷ Letter from Omar N. Bradley, General, United States Army, Administrator of Veterans’ Affairs, to Hon. Edith Nourse Rogers, Chairman, Committee on Veterans’ Affairs, House of Representatives, April 23, 1947.

⁸⁸ See P.L. 80-862.

⁸⁹ U.S. Congress, *House Committee Print No. 210, Report on Education and Training under the Servicemen’s Readjustment Act, as amended*, committee print, prepared by Administrator of Veterans’ Affairs, 81st Cong., 2nd sess., February 8, 1950, pp. 97-98.

⁹⁰ U.S. Congress, *House Committee Print No. 210, Report on Education and Training under the Servicemen’s Readjustment Act, as amended*, committee print, prepared by Administrator of Veterans’ Affairs, 81st Cong., 2nd sess., February 8, 1950, pp. 97-98.

⁹¹ See, for example, P.L. 81-266.

⁹² U.S. Congress, *House Committee Print No. 210, Report on Education and Training under the Servicemen’s Readjustment Act, as amended*, committee print, prepared by Administrator of Veterans’ Affairs, 81st Cong., 2nd sess., February 8, 1950, p. 36.

⁹³ U.S. Congress, House Committee on Veterans’ Affairs, *Education and Training and Other Benefits for Persons Serving in the Armed Forces on or after June 27, 1950*, to accompany H.R. 7656, 82nd Cong., 2nd sess., May 16, 1952, H.Rept. 82-1943, p. 108.

75% of the tuition and fees charged for it. Veterans pursuing flight training and another form of training received up to 75% of the flight fees and a monthly educational assistance allowance for the other form of training. Also, GI Bill participants' entitlement was reduced at an accelerated rate for flight training. While flight training reduced entitlement by one day for each \$1.25⁹⁴ in flight training benefits paid, veterans without dependents pursuing institutional training full-time could receive up to \$110 per month⁹⁵ thus using one day of entitlement for each \$3.67⁹⁶ in benefits.

Prohibition of Vocational Flight Training in the 1960s

The Post Korean Conflict GI Bill and Vietnam Era GI Bill, as enacted under the Veterans Readjustment Benefits Act of 1966 (P.L. 89-358), only permitted the approval of IHL flight training—flight training courses offered by an IHL for credit toward the college degree the veteran was pursuing—because flight training paid by GI Bill benefits had been primarily recreational in nature.⁹⁷

Authorization of Vocational Flight Training in the 1960s and 1970s

In response to veteran interest in flight training, the belief that some vocational flight training could be legitimately vocational, and a shortage of commercial pilots, subsequent GI Bill amendments broadened the types of approvable flight training and liberalized the benefits.⁹⁸ The VA, however, indicated that a “considerable amount” of flight training approved in order for GI Bill participants ostensibly to become commercial pilots was stopped once a private pilot certificate was achieved.⁹⁹ In 1967, the authority to approve vocational flight training was added if the flight school was approved by the SAA and the FAA, if the training was necessary for the attainment of a vocational objective in aviation, if the individual met the medical requirements for a commercial pilot certificate, and if the individual had a valid private pilot certificate or sufficient flight training hours for a private pilot certificate.¹⁰⁰ Veterans pursuing vocational flight training exclusively were limited to quarterly reimbursements equal to 90% of the tuition and fees charged for actual flight training received.¹⁰¹ The entitlement charge for vocational flight training was comparable to the charge for institutional training. In 1970, the approval standards for vocational flight training were expanded to include training generally accepted as necessary for a

⁹⁴ In January 1952, \$1.25 had the same buying power as \$14.11 in January 2023, according to the Bureau of Labor Statistics CPI Inflation Calculator, available at <https://data.bls.gov/cgi-bin/cpicalc.pl>.

⁹⁵ In January 1952, \$110 had the same buying power as \$1,241.84 in January 2023, according to the Bureau of Labor Statistics CPI Inflation Calculator, available at <https://data.bls.gov/cgi-bin/cpicalc.pl>.

⁹⁶ In January 1952, \$3.67 had the same buying power as \$41.43 in January 2023, according to the Bureau of Labor Statistics CPI Inflation Calculator, available at <https://data.bls.gov/cgi-bin/cpicalc.pl>.

⁹⁷ Hon. Roman C. Pucinski, “Veterans’ Affairs,” Extension of Remarks, *Congressional Record*, vol. 113 (September 18, 1967), p. 25892.

⁹⁸ U.S. Congress, House Committee on Veterans’ Affairs, Subcommittee on Education and Training, *Education Allowance Increase under Public Law 89-358*, 90th Cong., 1st sess., March 8, 1967, p. 328.

⁹⁹ Letter from W.J. Driver, Administrator, Office of the Administrator of Veterans’ Affairs, to Hon. Olin E. Teague, Chairman, Committee on Veterans’ Affairs, House of Representatives, June 19, 1967.

¹⁰⁰ See the Veterans’ Pension and Readjustment Assistance Act of 1967 (P.L. 90-77). The acceptance of sufficient flight training hours in lieu of a private pilot license was deleted by P.L. 91-219, enacted in 1970.

¹⁰¹ P.L. 90-631 provided monthly rather than quarterly reimbursements in response to veteran financial hardships. U.S. Congress, Senate Committee on Labor and Public Welfare, *Improving Education and Training Programs for Veterans and Providing Educational Assistance for Certain Widows*, to accompany H.R. 16025, 90th Cong., 2nd sess., 1968, S.Rept. 90-1394, p. 9.

vocational objective in the field of aviation and generally recognized as ancillary to a vocation other than aviation.¹⁰²

Prohibition of Vocational Flight Training in the 1980s

Ongoing concerns resulted in several investigations of the amount of GI Bill funds expended on flight training and the employment outcomes of those flight trainees. A 1979 General Accounting Office (GAO) report indicated that at the time more veterans had received flight training than pilot jobs existed and that flight-related employment outcomes were limited.¹⁰³ The GAO report recommended that the GI Bill no longer permit flight training (or increase the outcome requirements). The President's budgets for FY1977 through FY1981 recommended eliminating flight training as a cost savings proposal in part because VA investigations determined that most courses were avocational and completion often lead to temporary, part-time, and/or reduced wage employment.¹⁰⁴

In response to the investigations in the 1970s, flight training benefits and flight training under the GI Bills were limited. In 1980, Congress reduced the share of tuition and fees charges that GI Bill benefits paid for flight training from 90% to 60%.¹⁰⁵ In 1981, authority for VA approval of vocational flight training was repealed.¹⁰⁶

The MGIB-SR and MGIB-AD, as originally enacted in 1984, did not modify the flight training restrictions.¹⁰⁷ Participants could pursue IHL flight training but not vocational flight training.

Authorization of Vocational Flight Training under MGIB-SR and MGIB-AD from the 1980s to the Present

In 1989, authority for the approval of vocational flight training programs was temporarily reinstated for purposes of MGIB-SR and MGIB-AD.¹⁰⁸ The reinstatement was intended to address high veteran unemployment, a commercial pilot shortage, and veteran interest, although the VA and DOD expressed opposition on the grounds that such training did “not accomplish the basic employment objectives of the program.”¹⁰⁹ The approval requirements for vocational flight training were highly similar to those established in the 1970s: the flight school had to be approved by the SAA and the FAA, the training had to be necessary for the attainment of a vocational objective in aviation, the individual had to meet the medical requirements for a commercial pilot certificate, and the individual had to have a valid private pilot certificate. GI Bill benefits were

¹⁰² See P.L. 91-219.

¹⁰³ U.S. General Accounting Office (GAO, currently the U.S. Government Accountability Office), *GI Bill Benefits for Flight and Correspondence Training Should be Discontinued*, HRD-79-115, August 24, 1979.

¹⁰⁴ U.S. Congress, Senate Committee on Veterans' Affairs, *Budget Views and Estimates for Fiscal Year 1982*, committee print, 97th Cong., 1st sess., March 15, 1981, Senate Committee Print No. 5, p. 17; U.S. Congress, House Committee on Veterans' Affairs, *Veterans Rehabilitation and Education Amendments of 1979*, to accompany H.R. 5288, 96th Cong., 1st sess., 1979, H.Rept. 96-498, p. 112; and U.S. General Accounting Office (GAO, currently the U.S. Government Accountability Office), *GI Bill Benefits for Flight and Correspondence Training Should be Discontinued*, HRD-79-115, August 24, 1979.

¹⁰⁵ See P.L. 96-466.

¹⁰⁶ See P.L. 97-35.

¹⁰⁷ See P.L. 98-525.

¹⁰⁸ See P.L. 101-237. A complementary reinstatement for purposes of the Post-Vietnam Era Veterans Educational Assistance Program (VEAP) was enacted by P.L. 102-16.

¹⁰⁹ U.S. Congress, Senate Committee on Veterans' Affairs, *Education Programs for Veterans and Servicemembers*, on S. 820, S. 1997, S. 2307, and S. 2383, 100th Cong., 2nd sess., May 25, 1988, S.Hrg. 100-944, pp. 2-4, 10.

limited to 60% of the tuition and fees charged for actual vocational flight training for participants pursuing vocational flight training exclusively.¹¹⁰ As under current law, the entitlement charge was proportional to the maximum monthly educational assistance allowance the participant would have received for institutional training.

The VA was tasked with evaluating the effectiveness of such vocational flight training in preparing recipients for recognized vocational objectives in the field of aviation. Following VA testimony that 56% of vocational flight training survey respondents were employed in aviation, 27% were still in training, and 1% used the training for recreation, the four-year authority for vocational flight training established in 1989 was made permanent.¹¹¹

Restrictions on Entities Contracted to Provide Training from the 1990s to the Present

In 1996, subsection (f) of 38 U.S.C. §3680A was enacted, generally requiring that courses provided by a secondary ETI under contract to a primary ETI must be GI Bill approved.¹¹² Pursuant regulations established that the GI Bill payment amount be appropriate for the ETI actually providing the training.¹¹³ Because vocational flight training was limited to individuals who possessed a valid private pilot certificate, the provision required that an individual have a private pilot certificate if pursuing flight training at an IHL that had contracted such flight training out to a flight school.

Delayed Authorization of Vocational Flight Training under the Post-9/11 GI Bill in the 2010s

Under the Post-9/11 GI Bill, as originally enacted in 2008 (P.L. 110-252), participants could pursue IHL flight training but not vocational flight training. Amendments enacted in 2011¹¹⁴ authorized the current law approval requirements for vocational flight training and the vocational flight training benefits and entitlement charges under the Post-9/11 GI Bill. The current law approval requirements for vocational flight training amended 38 U.S.C. §3034(d)(2) to limit the approval of vocational flight training to

- training that is generally accepted as necessary for the attainment of a recognized vocational objective in the field of aviation;
- individuals who possess a valid private pilot certificate and meet, on the first day of flight training, the medical requirements necessary for a commercial pilot certificate; and
- courses that are FAA approved and offered by a certified pilot school that possesses a valid FAA pilot school certificate.

¹¹⁰ Reimbursement excluded charges attributable to solo flying hours.

¹¹¹ See P.L. 103-446; and U.S. Congress, Senate Committee on Veterans' Affairs, *Persian Gulf War Veterans' Compensation and Other Pending Legislation*, 103rd Cong., 2nd sess., September 14, 1994, S.Hrg. 103-829, p. 55.

¹¹² The provision was enacted by the Veterans' Benefits Improvements Act of 1996 (P.L. 104-275), 38 C.F.R. §21.4252(m).

¹¹³ U.S. Department of Veterans Affairs, "Criteria for Approving Flight Courses for Educational Assistance Programs," 63 *Federal Register* 34129, June 23, 1998; and 38 C.F.R. §21.4233(e).

¹¹⁴ The Post-9/11 Veterans Educational Assistance Improvements Act of 2010 (P.L. 111-377).

Vocational flight training was made available under the Post-9/11 GI Bill in order to provide training parity with MGIB-AD.¹¹⁵

Increased VA Oversight of Flight Training from the 2010s to the Present

In 2013-2015 compliance surveys, the VA uncovered several common disallowed practices occurring at flight programs offered by IHLs, resulting in the VA overpaying Post-9/11 GI Bill benefits.¹¹⁶ The Congressional Budget Office indicated that in 2014 the VA paid an average of \$42,000 per individual in Post-9/11 GI Bill tuition and fees for all beneficiaries enrolled in flight-training programs at public IHLs compared to the average of \$13,606 per individual in tuition and fees, housing, books and supplies, test fees, and other benefits for all Post-9/11 GI Bill participants.¹¹⁷ VA testimony expressed concern that public IHLs were targeting veterans for their flight-related degrees, especially those including helicopter training, and participants were enrolling in flight electives that were not required for their degree at public and private IHLs.¹¹⁸ The most common violations were the following:

- some IHLs certified, and VA paid for, hours in excess of the maximum hours in the program's approval;
- some IHLs certified, and VA paid for, charges for aircraft that were more expensive than the aircraft in the program's approval;
- some IHLs certified make-up hours for GI Bill participants who failed to complete the number of flight hours required for a course included in a prior enrollment certification (i.e., for which benefits were paid), and the IHLs did not amend the prior enrollment certification to an incomplete for such course in accordance with the standards of progress¹¹⁹;
- some IHLs certified participants in programs of education that failed the 85/15 rule, the requirement that no more than 85% of the students enrolled in a program receive financial support from the VA or ETI;
- some IHLs certified courses leading to a private pilot certificate although the instruction was offered by a contracted entity that was a flight school; and
- some IHLs certified the credits and charges associated with an elective flight course that was not required for completion of the degree program.

¹¹⁵ U.S. Congress, Senate Committee on Veterans' Affairs, *Post-9/11 Veterans Educational Assistance Improvements Act of 2010*, to accompany S. 3447, 111th Cong., 2nd sess., October 26, 2010, S.Rept. 111-346.

¹¹⁶ U.S. Department of Veterans' Affairs, *VBA Quarterly Education Service Webinar*, December 3, 2014; and U.S. Department of Veterans' Affairs, *IHLs with Contracted Flight Programs*, December 14, 2015.

¹¹⁷ Congressional Budget Office, *H.R. 3016: Veterans Employment, Education, and Healthcare Improvement Act*, November 19, 2015, p. 5; and U.S. Department of Veterans' Affairs, *Congressional Budget Submission, FY2016*, p. VBA-85.

¹¹⁸ U.S. Congress, House Committee on Veterans' Affairs, Subcommittee on Economic Opportunity, *Legislative Hearing on H.R. 456; H.R. 473; H.R. 474; H.R. 475; H.R. 476; H.R. 643; H.R. 1038; H.R. 1141; H.R. 1187; H.R. 1313; H.R. 1382*, 114th Cong., 1st sess., March 24, 2015, H.Hrg. 114-12, pp. 36-37.

¹¹⁹ 38 U.S.C. §§3675(b)(1), and 3676(b)(6) and (c)(7).

In 2015-2016, the VA clarified the statutory requirements and its policies regarding the approval and certification of IHL degree programs.¹²⁰ With respect to IHL degree programs that required private pilot instruction that was provided by flight schools through contract, the VA gave institutions until August 1, 2016, to come into full compliance.

As recently as 2021 and 2022, the VA has continued to highlight concerns related to public IHL flight training. In 2021, the VA provided congressional testimony regarding concerns about the increased incidence of and related program costs for vocational flight training offered under contract to a public IHL.¹²¹ Post-9/11 GI Bill benefits available for vocational flight training are capped, whereas benefits for IHL flight training may cover full in-state charges (**Table 2**). In 2022, the VA Office of Inspector General settled with a public IHL and its flight school contractor with respect to 85/15 rule violations that resulted in Post-9/11 GI Bill overpayments.¹²²

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¹²⁰ See, for example, U.S. Department of Veterans' Affairs, *IHL Degree Programs Involving Training Provided and Charged on an Hourly Basis – Clarification of Requirement to Identify Specific Required Training Time and Mandatory Fees (Cost-per-Hour Rate) in the School's Catalog*, Compliance and Liaison Advisory 223-15-01, September 1, 2015; and U.S. Department of Veterans' Affairs, *IHL Degree Programs Involving Private Pilot Courses Provided Under Contract With Flight Schools*, Compliance and Liaison Advisory 223-15-02, December 4, 2015.

¹²¹ U.S. Congress, House Committee on Veterans' Affairs, Subcommittee on Economic Opportunity, *Legislative Measures*, 117th Cong., 1st sess., September 21, 2021.

¹²² U.S. Department of Veterans Affairs, Office of Public Affairs, "Universal Helicopters Inc. and Dodge City Community College Agree to Pay \$7.5 Million to Settle False Claims Act Allegations Related to Post-9/11 GI Bill Funding," press release, August 15, 2022, <https://www.justice.gov/opa/pr/universal-helicopters-inc-and-dodge-city-community-college-agree-pay-75-million-settle-false>.