



## VETERANS EDUCATION SUCCESS

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### **Veterans Education Success: Concerns with Galvanize, Inc.**

Veterans Education Success has multiple concerns with Galvanize, Inc.'s coding bootcamps. This includes how Galvanize enrolls student veterans, the way Galvanize is treating student veterans, the quality of education at Galvanize coding bootcamps, and potentially illegal advertising on Galvanize's website.

#### **I. Background**

██████████, a student veteran who attended one of Galvanize's coding bootcamps, reached out to us in December 2019. ██████████ complained that Galvanize mismanaged his application for veterans education benefits by enrolling him under the Post 9/11 GI Bill instead of VET TEC.

██████████ enrolled at Galvanize approximately August ██████, 20████, for a course that was scheduled to begin on September ██████, 20████. He asked a Galvanize employee to use his GI Bill to pay for his tuition, but he did not have a certificate of eligibility. Galvanize staff told him to send them a screenshot of his Post-9/11 GI Bill Statement of Benefits from eBenefits, which he did. On August ██████, 20████, ██████████ received a certificate of eligibility stating that he was approved for VET TEC. Later, on September ██████, 20████, he received a certificate of eligibility stating that he was entitled to use the Post-9/11 GI Bill.

██████████ understood that, because he was approved for VET TEC, his tuition would be paid by the VET TEC program. As Galvanize is a Preferred VET TEC provider, he presumed they were used to using VET TEC benefits for veterans and assumed that Galvanize's staff would file the necessary paperwork to ensure that VET TEC would be used to pay for his tuition. He later found out that Galvanize charged his tuition to the Post-9/11 GI Bill, sent VA the wrong information, and that his time spent at Galvanize counted against his GI Bill entitlement. Galvanize's Associate General Counsel claimed that this was because ██████████ only mentioned the "GI Bill" in emails inquiring about veterans education benefits.

██████████ assumed that VET TEC was part of the GI Bill, and was not referring to the Post-9/11 GI Bill specifically when he wrote those emails. He made this assumption because his approval for VET TEC was based on his eligibility for the Post-9/11 GI Bill, and because of language in his VET TEC certificate of eligibility mentioning the GI Bill.

[REDACTED] withdrew due to Galvanize's low quality of education and to find work. Now he owes a [REDACTED] overpayment debt to VA. His time at Galvanize counted against 6 months of his GI Bill entitlement.

## II. Galvanize does not adequately inform veterans of education benefits during enrollment

Galvanize does not inform student veterans of their options related to VET TEC when they enroll, nor do they advise student veterans of how to use this benefit at their institution. [REDACTED] provided us with emails exchanged between him and a Galvanize employee during his enrollment:

### Forwarded Conversation

Subject: Post 9/11 GI Bill

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[REDACTED]

Hello,

I was referred to this email by [REDACTED] to continue my enrollment process. I've applied for my Education Benefits and also for the GI bill itself. The course I was just accepted into starts on September 3, so I wanted to try to get a jump on things. I know this is a short notice to try and get the benefit in place. Please let me know what you need from me.

Thank you,

[REDACTED]

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[REDACTED]

Hey [REDACTED],

Thanks for reaching out. We will need the following documentation from you prior to enrollment:

1. A copy of your Certificate of Eligibility for your GI Bill benefits.
2. Copies of transcripts of any prior post-secondary education that you've received.

You can email those in electronic form to [vabenefits@galvanize.com](mailto:vabenefits@galvanize.com). Let me know if you have any questions!

[REDACTED]

[REDACTED]

Program Lead - Data Science/Operation Level Up

[REDACTED]

galvanize

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[REDACTED]

[REDACTED]

Thank you for the quick reply.  
I received an enrollment email that indicates I will need to put down a deposit for the course. I submitted my application this morning and I know the VA can be pretty slow, so I'm not sure how soon to expect the certificate. Do you know of any ways that I could speed that process along?

[REDACTED]

[REDACTED]

Hey [REDACTED]

You can ignore the invoice for the deposit — assuming that you have full GI Bill eligibility, the VA will cover the full cost including the deposit amount. If it gets closer to the start date of the course and you don't yet have your COE, we *may* ask you to pay the deposit and then refund it to you upon receipt of your COE confirming your benefit eligibility.

In the meantime, I believe you can check the status of your request and obtain a Statement of Benefits here: <https://www.va.gov/education/gi-bill/post-9-11/ch-33-benefit/> If you're able to get a Statement of Benefits showing your eligibility, you can provide a screenshot of that to us in lieu of your COE.

Thanks!

[REDACTED]

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[REDACTED]

Hey [REDACTED]

I just wanted to check in. I sent the forms you asked for to the email you suggested and I received an email asking for the deposit and proof of higher education. What is the status of my GI bill/enrollment with the school?

Thank you,

[REDACTED]

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[REDACTED]

Hey [REDACTED]

Thanks for checking in, and congratulations on your acceptance to the SEI program! We did receive your documentation, so we should be good to go on that front. We will process your enrollment certification during the first week of class in September. Please let me know if you have any questions in the meantime!

Thanks,  
[REDACTED]

[text above: [REDACTED] enrollment emails, copied February 17, 2020]

At no point in this conversation is [REDACTED] advised of his eligibility for VET TEC or how to use VET TEC. Additionally, the Galvanize employee told [REDACTED] that he could send a screenshot of his "Statement of Benefits" from eBenefits in lieu of a certificate of eligibility. [REDACTED] was never told to send a certificate of eligibility to Galvanize after sending the screenshot, and he never sent a certificate of eligibility to Galvanize for the GI Bill or VET TEC. When our attorney inquired about Galvanize's enrollment practices, he was told that Galvanize does not advise student veterans of their eligibility for VET TEC unless they ask about it specifically:

[REDACTED]

1. What do you consider appropriate proof of eligibility? As I mentioned, it depends on the education benefit the student has chosen to use and the VA definition of appropriate proof for that benefit. I've included a couple snapshots below from VA and SAA documentation as a reference. For Post 9/11 GI Bill we accept a certificate of eligibility or a statement of benefits. For VET TEC, we only accept a certificate of eligibility.

VET TEC

- a. Enrollments must be submitted no earlier than 14 calendar days of the student Veteran's start date. Enrollments should only be submitted if the student has provided a copy of their VET TEC specific [Certificate of Eligibility \(COE\)](#).

Post 9/11 GI Bill (CH 33)

Your policy must permit any covered individual to attend or participate in the course of education during the period beginning on the date on which the individual provides to the educational institution a certificate of eligibility for entitlement to educational assistance under chapter 31 or 33 (a "certificate of eligibility" can also include a "Statement of Benefits" obtained from the Department of Veterans Affairs' (VA) website – eBenefits, or a VAF 28-1905 form for chapter 31 authorization purposes) and ending on the earlier of the following dates:

- 2. **To be clear, you don't always tell students about VET TEC prior to enrollment?** That is correct. When students inquire about available benefit options, we respond accordingly and link them to additional information. If a student tells us they are using a specific education benefit for which we are approved or ~~does not directly~~ inquire about available options, we typically do not bring up specific education benefits unsolicited.
- 3. **With regard to Greg, what did he send you to prove he was eligible for veterans education benefits?** Greg communicated interest in using Post 9/11 GI Bill (CH 33) benefits and provided a statement of benefits as proof of eligibility.
- 4. **Did he ever send you a COE?** Greg sent us a copy of his VET TEC COE for the first time January 21, 2020 via email.

[REDACTED]

[image above: email conversation between our attorney and Galvanize, downloaded February 17, 2020]

As mentioned previously, [REDACTED] assumed that VET TEC was part of the GI Bill after he received his certificate of eligibility. Schools participating in VET TEC should be required to advise student veterans on the use of their education benefits, including VET TEC. With regard

to Galvanize, considering how it advertises extensively about its status as a VET TEC school (as discussed below), its failure to inform [REDACTED] about his eligibility for VET TEC is especially concerning because a student veteran may easily be misled into using the wrong benefit.

**III. Galvanize mistreated [REDACTED] when he asked for compensation**

A Galvanize attorney threatened [REDACTED] when he asked for compensation. [REDACTED] asked Galvanize to reimburse him for the six months that counted against his GI Bill entitlement and costs which he paid himself above and beyond the GI Bill. In response, [REDACTED], an associate general counsel at Galvanize, threatened [REDACTED]:

[REDACTED]



[REDACTED] <[REDACTED]>

[REDACTED]

[REDACTED]

**You are viewing an attached message.**

Veterans Education Success Mail can't verify the authenticity of attached messages.

[REDACTED]

I never received any contact regarding my previous email.

I'm disappointed that when an issue is raised regarding how veterans benefits are being mishandled, it's brushed off and forgotten about. I've shared the information regarding my eligibility under VetTec - the same information that was shared during the meeting we had in November.

Galvanize has had all of the information needed to make any attempts to correct this mistake for over two months, but has made no efforts to do so. Business practice and quality of education aside, the frivolity in which federal funds are being handled is astounding. The information is presented clearly, and there should be no need for a complex resolution.

Can we please work together to resolve this issue?

Respectfully,

[REDACTED]

[text above: [REDACTED] email to [REDACTED], copied February 17, 2020]

██████████,

You sent us your most recent email two days ago. It is completely reasonable to investigate the matters you've raised before responding. We have now completed the investigation, and reject your demand for compensation as we properly certified your enrollment pursuant to your instructions.

I also must take issue with the unprofessional and unproductive tone of your communications with us, and your unsubstantiated allegations that we intentionally mishandled your enrollment. Your allegations are patently false and the **many documented instances where you specifically requested to use your Post 9/11 GI Bill benefits** clearly establish that we certified you correctly. The email with our enrollment team member that you forwarded specifically states your request to use the Post 9/11 GI Bill, and aligns with all of our records. As such your enrollment was appropriately certified under the GI Bill, as per your request.

Despite your assertion, we only received the VET-TEC COE from you for the first time via your January 21, 2020 email demanding that we compensate you. To the extent that you intended to enroll under VET-TEC, we have no record that you ever informed us until 11/18, after you already withdrew. At that time we requested that you send us documentation so that we can investigate, and potentially assist with correcting the error, but you never did until three days ago. Our investigation failed to uncover any documentation relating to VET-TEC, and on the basis of your approach to this matter, and your allegations, we are unwilling to provide any further assistance to you.

Further, Galvanize has dedicated a tremendous amount of time, resources and energy in support of veteran's programs. The number of veteran's who enroll in our program, in good faith, and graduate to achieve life-changing outcomes reaffirms that we are doing a great job. I have already escalated this ticket to the appropriate federal agencies for an investigation. I will also be reaching out to VET-TEC to let them know about this matter as well so that they are fully aware of this incident, and your highly inappropriate response.

If you wish to discuss this further, I ask that you direct any inquiries to this group, and only do so in writing to preserve the record.

Truly,

██████████  
Associate General Counsel

[text above: ██████████ response to ██████████ email, copied February 17, 2020]

██████████ stated that he “escalated this ticket to the appropriate federal agencies for an investigation” and that he would “be reaching out to VET-TEC to let them know about this matter as well so that they are fully aware of this incident, and [██████████] highly inappropriate response.” It is not clear what ██████████ was referring to when he stated he would be escalating “this ticket to the appropriate federal agencies,” but it seems to be an attempt to intimidate ██████████ from seeking compensation from Galvanize and to threaten him with legal action. Galvanize is mistreating student veterans who seek reasonable resolutions from Galvanize, which is not behavior that one would expect from a VA Preferred Provider.

#### **IV. Galvanize may be providing students with a low quality education**

██████████ had multiple issues with the quality of education at Galvanize. Here is part of the complaint that he originally sent to us:

“Claiming Galvanize provides 9 months (the equivalent of 1.5 years of collegiate education) of instruction for a three month course, that barely touches on any

development fundamentals, while staffed with instructors that only have a superficial understanding of what they're teaching, is fraudulent...Instructors could only give cookie cutter responses to the problems students faced, and often did not fully understand the problem themselves. I spent a large amount of my own time explaining concepts to students, because the course content was shallow and incomplete.

The number of hours students are expected to be at Galvanize would not be an issue, if those hours were used for productive instructional time. Independent work time is important, but the ratio of 6 instructional hours a week to 48 hours of independent work time is far too skewed-- especially when the content being provided is often through videos or step by step guides (content that is abundantly available, and for free). Galvanize is polluting the software industry by teaching amateur practices and tools, presenting them as industry and professional standards. The business itself revolves around presenting the idea of being a tech company. Putting classrooms, meetings, and workshops on display in fish tank offices admittedly looked professional, and presents a 'tech' workplace. Though, after spending some time in and around the building, it became very clear that Galvanize's business is marketing ploys and mass production, encouraging the alumni to promote the school in droves, creating a cult like atmosphere for second rate professionals. The school is staffed by other Galvanize graduates with little to no industry experience, offering a facade of mentorship and guidance. Hiring students gives them 'industry experience', padding Galvanize's success numbers and gaining cultural influence, growing the business and further diluting the industry."

In addition to the information provided above, ██████ told us that Galvanize hires students to work as teachers. Our attorney looked into ██████ claim that Galvanize hires students. According to Galvanize's Student Facilities and Portal Use Agreement, Galvanize does in fact hire students: "[u]pon graduation, or after you complete your residency employment with Galvanize if applicable, you will be provided an option to stay on as a Galvanize member for six 6 months."<sup>1</sup> Galvanize also states that it hires students to teach on its website:

After students graduate from our [Software Engineering Immersive bootcamp](#), we hand-select a few to be Residents, who assist with training students in Javascript fundamentals and best practices. We sat down with [Chad Cramer](#), Software Engineering Immersive Resident at [Galvanize Austin](#), to learn about why he wanted to become a Software Engineer, how he transitioned from a background in Finance, how and how he helps students as a Resident.

*[image above: Galvanize article discussing how it hires graduates, downloaded February 3, 2020]*

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<sup>1</sup> See Enclosure 1, p. 11.

Based off [REDACTED] complaint, Galvanize is providing students with a low quality education. Additionally, Galvanize might be hiring students in order to inflate post-graduate employment rates.

**V. Galvanize advertises to veterans extensively and makes potentially illegal claims about student outcomes on its website**

Galvanize advertises to veterans extensively on its website, as shown by the screenshots below. It also advertises its eligibility to receive VET TEC funding.



[image above: <https://www.galvanize.com/vets>, downloaded December 27, 2019]



[image above: screenshot of Galvanize video targeting veterans (1:41 in the video), downloaded December 27, 2019]



## VET TEC

VET TEC is a tuition and housing assistance pilot program focused on advancing your IT career by offering high-tech training and skills development sought by employers. If you have at least one day of unexpired G.I. Bill® entitlement, then you may be eligible for VET TEC.

The following bootcamps are eligible for VET TEC:

- Galvanize Data Science Immersive bootcamp
- Hack Reactor Software Engineering Immersive bootcamp
- Hack Reactor Remote Software Engineering Immersive bootcamp

[image above: Galvanize webpage describing VET TEC, downloaded December 27, 2019]

## VET TEC

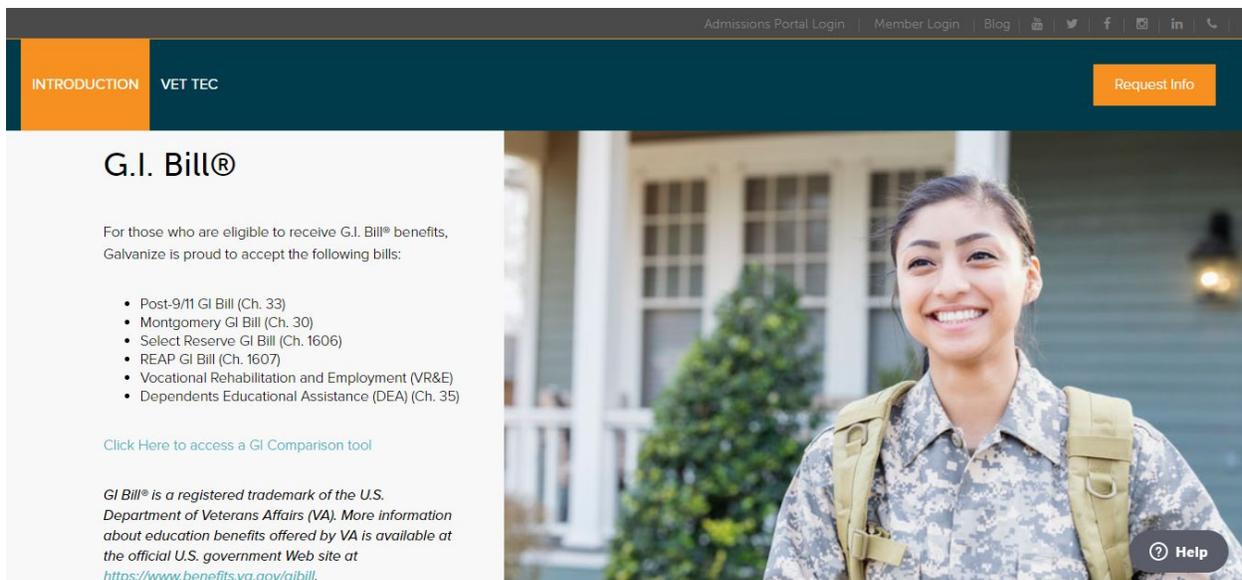
VET TEC is a tuition and housing assistance pilot program focused on advancing your IT career by offering high-tech training and skills development sought by employers. If you have at least one day of unexpired G.I. Bill® entitlement, then you may be eligible for VET TEC. We are currently unable to offer VET TEC funds for part time programs.

### How to Receive Your Benefits:

1. Apply to VA to obtain your Certificate of Eligibility (COE)
2. Complete the VONAPP application on the VA website using the VAF 22-0994 (The VAF 22-1990 is only required if you have never applied for any VA Education Benefit in the past. Note: If you already receive VA education benefits, you don't need to fill out VA Form 22-1990 again)
3. Apply for Galvanize's Data Science bootcamp, Hack Reactor's Onsite Software Engineering bootcamp, or Hack Reactor's Online Software Engineering bootcamp.

**More Information >**

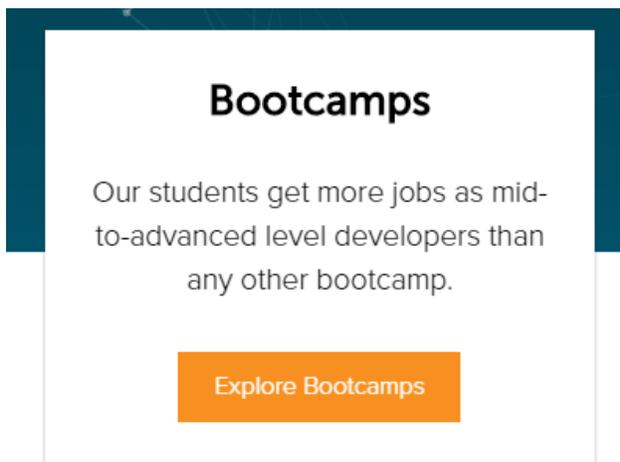
[image above, Galvanize webpage describing VET TEC, downloaded December 27, 2019]



[image above: Galvanize webpage describing the GI Bill, downloaded December 27, 2019]

As shown by the images above, Galvanize states that it “supports” veterans with its coding bootcamps, has videos featuring classrooms decorated with military rank structure, and has pages describing veterans education benefits like VET TEC and the GI Bill. While it is clear that Galvanize is targeting student veterans with these advertisements, these images also demonstrate that Galvanize did a disservice to ██████████ by not advising him about VET TEC and how to utilize that benefit. As a Preferred VET TEC provider, Galvanize clearly has an understanding of veterans education benefits that the average veteran is unlikely to have.

In addition to targeting veterans, Galvanize also makes claims that likely constitute illegal misrepresentations. Galvanize claims that its graduates “get more jobs as mid-to-advanced level developers than any other bootcamp.”



[image above: Galvanize post-graduate employment claim, downloaded December 27, 2019]

Our attorney asked about this claim and what data Galvanize was relying on through a chat tool on its website, and was directed to the Council on Integrity in Results Reporting (“CIRR”) to review their data.

CIRR is a non-profit organization of people affiliated with coding bootcamps that collects data about coding bootcamps.<sup>2</sup> For example, CIRR board members are all affiliated with coding bootcamps. Galvanize’s Career Services Director, Crista Wray, is on CIRR’s board.<sup>3</sup> CIRR itself “began as a project of Skills Fund.” Skills Fund is a loan financing company based in Texas.<sup>4</sup> Skills Fund’s CEO, Rick O’Donnell is also on CIRR’s board.

When we looked at CIRR’s data, it found that non-profit schools that offer coding bootcamps, such as George Washington University, the University of Virginia, Case Western Reserve University, and the University of Texas at Austin, were not included. By contrast, 6 of Hack Reactor’s campuses (which was acquired by Galvanize) appear in CIRR’s July – December 2018 graduate outcomes data.<sup>5</sup>

The Federal Trade Commission has determined such advertising practices to be illegal in the past. In 2016, the Commission sued DeVry University for misrepresenting post-graduate employment rates. DeVry claimed that “[i]n 2013, 90% of DeVry University graduates actively seeking employment obtained careers in their field within six months of graduation, or were already employed in their field when they graduated” and that “[o]ne year after graduation, DeVry University grads report earning 15% more than the median earning reported by all other bachelor’s degree graduates.”<sup>6</sup> DeVry relied on self-reporting data from students.<sup>7</sup> The Commission determined that DeVry’s data did not substantiate its claims, and that it violated Section 5(a) of the FTC Act. DeVry settled with the Commission and agreed to pay \$100,000,000.<sup>8</sup>

Again, Galvanize claims that its graduates “get more jobs as mid-to-advanced level developers than any other bootcamp.” CIRR excludes non-profit coding bootcamps from its data analysis. If Galvanize is only relying on data from CIRR, then their claim that its students get more jobs than any other bootcamp is based on incomplete data, and likely in violation of Section 5(a) of the FTC Act.

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<sup>2</sup> <https://cirr.org/>.

<sup>3</sup> <https://cirr.org/about>.

<sup>4</sup> <http://tmsearch.uspto.gov/bin/showfield?f=doc&state=4810:wq12ha.3.1>.

<sup>5</sup> <https://cirr.org/data>.

<sup>6</sup> <https://www.ftc.gov/system/files/documents/cases/160127devrycmpt.pdf>, p. 5.

<sup>7</sup> *Id.* at 11.

<sup>8</sup> <https://www.ftc.gov/news-events/press-releases/2016/12/devry-university-agrees-100-million-settlement-ftc>.

## **VI. Conclusion**

Based on the information above, Galvanize is not providing veterans with enough information about veterans education benefits when they enroll. Additionally, Galvanize mistreated a veteran who sought compensation due to Galvanize's mismanagement of his application for veterans education benefits. Galvanize might also be providing students with low quality education, especially considering that it hires recent graduates to teach. Finally, Galvanize's advertising practices seem to violate Section 5(a) of the FTC Act. We would like VET TEC to reevaluate Galvanize, Inc.'s status as a "preferred" VET TEC provider and its eligibility to receive VET TEC funding.