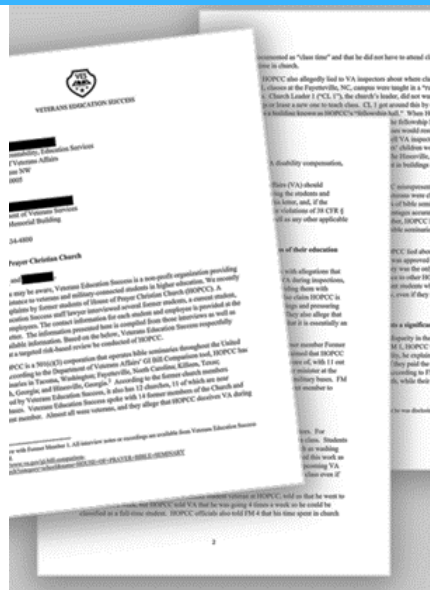




VETERANS EDUCATION SUCCESS

RESULTS OF OUR REVIEW OF VA APPROVAL CORRESPONDENCE FOR TWO HOUSE OF PRAYER BIBLE SEMINARIES IN GEORGIA

DECEMBER 2022 REPORT



Executive Summary

Before it was raided by the FBI in June 2022, the House of Prayer Bible Seminary (HOP) reportedly received approximately \$7 million in GI Bill funds from VA to educate veterans. Our review of the Georgia SAA's approval and oversight correspondence regarding HOP revealed several concerns in the GI Bill approval process. We reviewed more than 100 pages of correspondence and documents to, from, or about HOP spanning 11 years; the Georgia SAA provided these documents in response to our public records request of June 2022, when the news of the FBI raid became public.¹

¹ The public records we received from the Georgia SAA are available at: <https://vetsedsuccess.org/georgia-saa-documents-about-house-of-prayer-in-response-to-our-public-records-request/>. The material provided did not include documents between the U.S. Department of Veterans Affairs (VA) and the Georgia SAA related to our August 2020 letter to both of them raising allegations of fraud by HOP. As a result, we submitted a Freedom of Information Act (FOIA) request to VA in August 2022 for correspondence and records from the date of our August 2020 letter and the June 2022 Federal Bureau of Investigation's (FBI) raids of HOP campuses. Our request was denied because its disclosure might interfere with ongoing enforcement proceedings. The VA Office of Inspector General (OIG) suggested that we resubmit our FOIA request when the case has been closed. See <https://vetsedsuccess.org/department-of-veteran-affairs-response-to-our-freedom-of-information-act-foia-request-for-communications-regarding-the-house-of-prayer-bible-seminary/>

I. Background

Allegations

In March 2020, a married couple contacted Veterans Education Success with allegations of widespread fraud by the Georgia-based church and seminary. Over the ensuing weeks, our legal staff interviewed 14 current and former students, employees, and church members—almost all of whom were veterans—who alleged the following:

- HOP lied to VA inspectors about the time students spent in class, where classes were taught, the proportion of students who were using the GI Bill, and the number of students it had enrolled at certain campuses.
- HOP coached veterans to increase their VA disability compensation payments fraudulently and to obtain VA home loans and then pressured the veterans to donate the money and homes to the church.
- GI Bill beneficiaries were charged higher tuition than other students.
- HOP lied about teacher qualifications.
- Students spent class time recruiting new church members.
- HOP repeatedly changed its curriculum to keep students enrolled longer.
- Despite depleting their GI Bill benefits, students never received a diploma or other credential.
- The curriculum spelled out in the school’s catalog was not actually taught, and the education was extremely low-quality.
- HOP did not provide students with financial or academic records.
- Church members were told by military officials to stop recruiting on military bases.

In August 2020, we summarized all of the allegations we received from the 14 individuals in a letter² to VA and the Georgia SAA. The Georgia SAA Director later said³ that, because the allegations were criminal in nature, his office had referred the allegations to VA.⁴

Almost two years later, the FBI raided all five bible seminaries, seizing computers and records. Citing the FBI raid, approval to enroll beneficiaries at all HOP Bible Seminaries was subsequently withdrawn and the campuses were removed from the GI Bill Comparison Tool. Neither the FBI, VA, nor the SAAs have released any additional details about the evidence collected during the raid.

GI Bill Approval

As of June 2022, the HOP Christian Church had 10 locations across the United States. Five of its ministries operated bible seminaries, all of which were near U.S. military installations where they actively recruited church members and potential seminary students.

² Veterans Education Success, “Our Letter to VA and Georgia SAA Regarding House of Prayer Christian Church,” August 1, 2020, available at: <https://vetsedsuccess.org/letter-to-va-and-georgia-saa-regarding-house-of-prayer-christian-church/>.

³ See Hayley Boland, “Report Compiled by Veterans Education Success Claims House of Prayer Church Committed Fraud,” *WTOC 11*, June 24, 2022, available at: <https://www.wtoc.com/2022/06/24/report-compiled-by-veterans-education-success-claims-house-prayer-church-committed-fraud/>.

⁴ Prior to the allegations we received in 2020, no veteran education complaints against HOP were submitted to VA. We speculate the prior lack of complaints could be attributed to the described “cult-like” control that students and teachers alleged the church exercised over its members, who were allegedly ostracized and subjected to public humiliation if they questioned the church’s leader.

In 2012 and 2014, the Hinesville and Hephzibah, Georgia, seminaries applied to the SAA for approval to enroll GI Bill beneficiaries and were subsequently approved. Table 1 provides a brief chronology of the Georgia SAA’s interactions with the HOP campuses in Georgia from 2012 through June 2020.

Table 1: Brief Chronology of HOP Interactions with Georgia SAA

Date	Action
1/10/12	Georgia Nonpublic Postsecondary Education Commission approves a religious exemption from provisions of the Georgia Nonpublic Postsecondary Educational Institutions Act of 1990 for nonprofit HOP Bible Seminary in Hinesville, Georgia, which status carried “no state recognition whatsoever as to approval, accreditation, or authorization to operate.”
2/29/12	HOP Bible Seminary in Hinesville, GA, applies to the SAA for VA benefits
9/28/12	SAA documents that it conducted an “approval visit” of the Hinesville facility on 9/26/12 and that “All areas are adequate and meet the requirements for site approval. The facility appears to be in compliance with approval criteria.”
10/2/12	SAA transmits approval package of HOP Bible Seminary as a proprietary nonaccredited degree-granting institution to the VA regional office
3/20/14	HOP Bible Seminary applies for approval of a new school in Hephzibah, Georgia
3/31/14	SAA documents that it conducted an “approval visit” of the HOP Bible Seminary Hephzibah facility on 3/27/14 and that “All areas are adequate and meet the requirements for site approval. The facility appears to be in compliance with approval criteria.”
4/1/14	SAA transmits approval package for HOP Bible Seminary-Hephzibah as a proprietary non-profit, non-accredited, non-college degree granting institution to the VA regional office
10/30/14	SAA transmits approval for Addendum (fee schedule) to 2014-2015 Catalog for HOP Bible Seminary-Hephzibah to the VA regional office
3/7/16	SAA transmits approval package for three new certificate programs at HOP Bible Seminary-Hephzibah to the VA regional office
2/18/20	HOP Bible Seminary-Hephzibah submits application for update of approval, no changes to the programs
3/19/20	In reference to “Catalog Update” the SAA asks for a PDF version of the HOP catalog for both locations because SAAs “now can only submit catalogs electronically to VA”
4/7/20	Because of COVID, the SAA approves the HOP’s request to offer its classes via correspondence using a teleconference system with the proviso that the school takes attendance at the beginning of each call
7/22-23/20	SAA emails HOP Bible Seminary following review of the catalog, stating “I have a few concerns” and requesting more specificity be provided in the catalog with respect to credit for previous training and to include a pro rata refund policy for at least VA GI Bill beneficiaries; HOP provides addendum to the catalog
7/24/20	SAA transmits approval for HOP Bible Seminary-Hephzibah previously approved programs and enclosures, including 2020-2022 Catalog with addendum
8/1/20	Veterans Education Success sent a letter to VA and the Georgia SAA summarizing allegations made by 14 HOP students, employees, and church members
8/21/20	HOP Bible Seminary notifies SAA it is discontinuing fees for all students for upcoming semester
12/29/20	HOP Bible Seminary submits addendum to catalog
1/14/21	SAA transmits approval of 2020-2022 Catalog addendum to the VA regional office
6/23/22	FBI raids HOP bible seminaries in five states
6/27/22	SAA notifies HOP that effective June 24, 2022, its Hinesville and Hephzibah campuses were withdrawn from State approval and no longer authorized to certify new students to the Department of Veterans Affairs “based on the current FBI investigation”

Source: Veterans Education Success review of correspondence received through a public records request made to the Georgia SAA. Fact of FBI raid reported by media.⁵

⁵ See Alexandra Koch, “FBI Raids Georgia Church Near Military Bases, Sources Say Church Was Targeting Soldiers,” June 24, 2022, *Savannah Morning News* via *USA Today*, available at: <https://www.usatoday.com/story/news/nation/2022/06/24/fbi-raids-house-prayer-churches/7724801001/>.

From 2014 through 2015, seminaries in Texas, Washington State, and North Carolina were also approved by those states' SAAs to enroll veterans and qualifying dependents, according to archived copies of VA's GI Bill Comparison Tool, which shows all approved education programs. According to press reports, VA paid the HOP approximately \$7 million in tuition and fees for the GI Bill beneficiaries it enrolled.⁶

II. HOP's Application Contained Inconsistencies and Problems That—Had They Been Investigated—Could Have Stopped the Fraud Years Prior to the FBI Raid

38 USC § 3676 (b) requires an institution offering non-accredited courses to submit an application to the appropriate SAA, along with two copies of the institution's catalog that must contain certain information. Under 38 USC § 3676 (c), an SAA may approve an institution offering non-accredited courses if, after an investigation, it finds the institution meets certain listed criteria. Based on the Georgia SAA's correspondence to, from, and about HOP, we identified inconsistencies and problems in HOP's application, which should have triggered additional scrutiny. The fact that these inconsistencies and problems were not investigated highlights shortcomings in the approval and oversight process used nationwide.

a. Self-reported, handwritten financial information.

From a review of GA SAA online archived records and forms, it appears that in 2012 and 2014 the financial soundness inquiry was satisfied by HOP's filling out a form. The approval paperwork for Hinesville in 2012 contains VSO Form 67 prepared by HOP's "Controller/Secretary"; information provided on the form in 2012 purportedly is "the Financial Statement of December 2011." The approval paperwork for Hephzibah in 2014 also contains VSO Form 67 prepared by the same person under the title "Secretary." The 2014 form contains only handwritten information. There is no indication from either 2012 or 2014 that the information had been prepared by a certified public accountant. No other financial records of HOP, such as financial statements for multiple years, annual reports, or bank statements, were provided. The statute requires the SAA to investigate whether "[t]he institution is financially sound and capable of fulfilling its commitments for training," with no additional clarification beyond the basic requirement.⁷

b. No evidence of verification of teacher qualifications.

As students, staff, and church members alleged in 2020, instructors were not qualified to teach. Nearly a decade earlier, none of the correspondence obtained from the SAA through our public records request included information about HOP instructors' qualifications, nor any request for documentation about the teachers. Instead, instructors are mentioned only in terms of what is required for catalog approval. The 2020–2022 Catalog, the only version provided in response to our public records request, lists 13 faculty members, all with the title "Rev.," and no other information such as education, training, or experience. 38 USC § 3676 (c)(5) allows an SAA to approve a non-accredited institution "when the institution and its non-accredited courses are

⁶ See Steve Beynon and Thomas Novelty, "How a Church Allegedly Scammed Millions in VA Money from Vets," July 19, 2022, *Military.com*, available at: <https://www.military.com/daily-news/2022/07/19/how-church-allegedly-scammed-millions-va-money-vets.html>. (Separately, we attempted to calculate Post-9/11 GI Bill payments to HOP from its initial approval in FY 2013 through the June 2022 FBI raid using the GI Bill Comparison Tool. However, the data were incomplete after FY 2018. Total payments reflected on the Comparison Tool from FY 2013 through August 2020 totaled \$4,962,515.)

⁷ 38 USC § 3676 (c)(9).

found upon investigation to have met the following criteria,” including “[e]ducational and experience qualifications of directors, administrators, and instructors are adequate.”

c. School records were inadequate or nonexistent.

Students, staff, and church members alleged HOP had inadequate records:

- Attended HOP for years without receiving a certificate or degree.
- HOP does not provide students with financial or academic records. Student was told we “don’t do records.”

Source: Allegations contained in our August 2020 letter to VA and the Georgia SAA.⁸

In 2012 and 2014, HOP provided the SAA with lists totaling individuals who the school said had graduated from associate and bachelor’s degree programs, including a surprising number of people who share the same surname and appear to be married couples. In 2012, HOP provided a total of 41 names of persons who purportedly graduated from 2009–2011, and in 2014 HOP provided nine names of purported graduates from 2011–2013. Requesting academic records to support the claimed graduation of these 50 individuals would have enabled the SAA to confirm their graduation. Under 38 USC § 3676 (c)(7), an SAA may approve an institution if after investigation it finds “[a]dequate records as prescribed by the State approving agency are kept to show attendance and progress or grades, and satisfactory standards relating to attendance, progress, and conduct are enforced.”

d. Information submitted on the institution and its programs was suspicious and should have required an explanation.

HOP submitted dubious information for its course approvals. For example, HOP submitted inconsistent program duration data about its courses: The SAA approved the HOP’s application to offer three programs at its Hinesville location in 2012, and then, in 2014, HOP submitted a new application for the same three programs at a different Georgia location. The school’s 2012 application requested approval for a certificate program (18 hours), associate (72 hours), and bachelor’s (144 hours), but by 2014 the length of the three programs was expressed in clock hours—certificate (3,024 clock hours), associate (1,728 clock hours), and bachelor’s (3,465 clock hours)—rather than the prior description, which likely referenced credit hours (see Table 2). The application form in 2012 and 2014 included a notation to provide “Complete CLOCK (contact) HOURS if your institution is a Non-College Degree (NCD) institution.” There was no explanation for the use of credit hours or change to clock hours in the approval correspondence we reviewed and no request by the SAA for an explanation in the documents we reviewed. Although that correspondence included only limited excerpts from the catalog, the materials we received included a full copy of the 2020–2022 HOP catalog, which provided additional details on the programs provided at both the Hinesville and Hephzibah locations: certificate (126 credit hours, 3,024 clock hours); associate (72 credit hours; 1,728 clock hours); and bachelor’s (144 credit hours, 3,456 clock hours).⁹

⁸ Veterans Education Success, Letter to the U.S. Department of Veterans Affairs and Georgia State Approving Agency, RE: House of Prayer Christian Church, August 1, 2020, available at: <https://vetsedsuccess.org/letter-to-va-and-georgia-saa-regarding-house-of-prayer-christian-church/>.

⁹ It is possible the change was rooted in the apparent confusion around whether HOP was considered a non-college degree granting institution (as evident in documents discussed below).

Former students and church members later alleged that HOP renamed and reordered classes to deceive students and the VA into paying for potentially repetitive courses, as we documented in our August 2020 letter to VA and the Georgia SAA.

- The school used several tricks to keep the money flowing: classes were renamed because VA won't pay for a veteran to repeat a course.
- The school changed course titles and broke them into multiple classes to keep students enrolled longer.

Source: Allegations contained in our August 2020 letter to VA and the Georgia SAA.¹⁰

The inconsistent program duration data provided to the SAA by HOP raises the following issues:

- The HOP bachelor's degree program approved in 2012 required 144 credit hours of coursework, 24 credit hours more than a typical bachelor's degree. But, in a 2014 approval of the same degree program at a different location, 3,456 clock hours and no credit hours were reported. The Education Department's guidance on clock hours is complex and has changed over time. At a minimum, the SAA should have asked why HOP changed how it reported program duration and calculated the equivalent credit hours.¹¹
- Why would the 2014 certificate program (3,024 clock hours) have almost as many clock hours as the bachelor's degree program (3,465 clock hours)?
- Why is the certificate program in the 2020 catalog longer than an associate degree program—126 credit hours versus 72 credit hours, respectively?
- In 2016, HOP applied to offer three new certificate programs—Biblical Development, Advanced Biblical Development, and Christian Principles. Aside from slight differences in the programs' names, it is unclear what distinguished these three programs from one another or from the previously approved Certificate in Advanced Discipleship. Introducing purportedly new programs may have allowed HOP to re-enroll the same veterans without violating the rule that VA benefits cannot be used to take the same course or program over again.

Table 2: Information on Program Duration Submitted by HOP to the Georgia SAA from 2011 through 2020 Should Have Raised Questions about the Legitimacy of Seminary Programs

Credential	GA Campus location	Approval date	First offered	Program duration	
				Credit hours	Hours/clock hours
Certificate in Advanced Discipleship	Hinesville	10/2/12	3/2/09	18 credit hours ^a	18 hours
	Hephzibah	4/1/14	3/1/11	Not available	3,024 clock hours
	Hinesville & Hephzibah	4/1/14	2009 & 2011	126 credit hours	3,024 clock hours
Associate in Biblical Studies	Hinesville	10/2/12	3/2/09	72 credit hours ^a	72 hours
	Hephzibah	4/1/14	3/1/11	Not available	1,728 clock hours

¹⁰ Veterans Education Success, Letter to the U.S. Department of Veterans Affairs and Georgia State Approving Agency, RE: House of Prayer Christian Church, August 1, 2020, available at: <https://vetsedsuccess.org/letter-to-va-and-georgia-saa-regarding-house-of-prayer-christian-church/>.

¹¹ The conversion factor was increased from 30 to 37.5 in 2010 (divide 37.5 into clock hours to obtain credit hours); see U.S. Department of Education, Program Integrity Questions and Answers – Credit Hour, available at: <https://www2.ed.gov/policy/highered/reg/hearulemaking/2009/credit.html>. The U.S. Department of Education changed the conversion factor back to 30 in 2021. See U.S. Department of Education, Federal Student Aid, Implementation of updated clock-to-credit conversion regulations (EA ID: GENERAL-21-34), available at: <https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2021-05-25/implementation-updated-clock-credit-conversion-regulations-ea-id-general-21-34>. Also see p. 33 of documents from the Georgia SAA about House of Prayer in response to our public records request, available at: <https://vetsedsuccess.org/georgia-saa-documents-about-house-of-prayer-in-response-to-our-public-records-request/>, for program clock hours.

	Hinesville & Hephzibah	4/1/14	2009 & 2011	72 credit hours	1,728 clock hours
Bachelor's in Advanced Biblical Studies	Hinesville	10/2/12	3/2/09	144 credit hours ^a	144 hours
	Hephzibah	4/1/14	3/1/11	Not available	3,456 clock hours
	Hinesville & Hephzibah	4/1/14	2009 & 2011	144 credit hours	3,456 clock hours

Source: Veterans Education Success review of correspondence received through a public records request made to the Georgia SAA.

Note: Although the HOP academic catalog presumably contained more complete information, only the 2020–2022 catalog was included in the correspondence provided in response to our public records request.

^aWe reached out to experts to better understand the program duration information. We were told that the hours reported in 2012 were likely “credit hours,” which generally equate to three credits per course. To estimate the number of credit hours for 2012, we divided the total number of hours by three.

There were also discrepancies about the school’s institutional sector: The October 2012 SAA approval of HOP Hinesville, Georgia, stated that the school was a “proprietary” institution, while the April 2014 approval for Hephzibah, Georgia, stated it was a “proprietary nonprofit” institution. We also reviewed institution type in an archived copy of the GI Bill Comparison Tool full data set downloaded in February 2016. The Georgia, Washington, and North Carolina HOP Bible Seminaries were identified as nonprofit, but the Texas campus was listed as for-profit.

III. Aside from Possible Deficiencies in HOP’s Paperwork, the Overall GI Bill Approval Process Lacks Safeguards

Listed in the section above are possible deficiencies in HOP’s paperwork. But, beyond the paperwork HOP submitted, HOP’s alleged fraud might have been revealed earlier if the GI Bill approval process included additional safeguards.

a. Open fraud investigations were not uncovered.

Our findings indicate that the SAA contacted the U.S. Federal Trade Commission to determine if it had any adverse information on HOP and reported in its approval letter to the VA Regional Office that no adverse information was received. However, as our letter to VA and the SAA pointed out, several of the 14 complainants interviewed by our legal team indicated that HOP was also under investigation by the FBI for mortgage fraud. According to *Military.com*, the U.S. Attorney in Savannah, Georgia, started an investigation in 2007, five years before HOP was approved to enroll veterans.¹² Such an investigation should have been a warning sign that should have jeopardized HOP’s application to enroll veterans. However, there is no indication in the correspondence that the SAA contacted any organization other than the FTC. The current federal statutes governing program approval for the GI Bill do not require SAAs to contact the U.S. Attorney in their state to learn if a school faces law enforcement concerns, although they are now required to ascertain if any federal department or agency has taken punitive action against the school for misleading or deceptive practices.¹³

¹² Steve Beynon and Thomas Novelty, “How a Church Allegedly Scammed Millions in VA Money from Vets,” *Military.com* (July 19, 2022), available at: <https://www.military.com/daily-news/2022/07/19/how-church-allegedly-scammed-millions-va-money-vets.html>.

¹³ Currently, under 38 USC § 3676 (c)(10)(a), the SAA is supposed to ascertain that no “Federal department or agency has taken a punitive action, not including a settlement agreement, against the school for misleading or deceptive practices.” The version of 38 USC § 3676 (c)(10) applicable during 2012 (and until the provision was amended in 2021) required the SAA to ascertain only “from the Federal Trade Commission whether the Commission has issued an order to the institution to cease and desist from any act or practice ...”

b. Enrollment numbers may have suggested noncompliance with the 85/15 rule.

By federal statute, the maximum number of GI Bill beneficiaries and “institutionally supported” students at eligible schools is capped at 85 percent of total enrollments, meaning that the remaining students must cover tuition from sources other than VA or the institution.¹⁴

Allegations from several church members about HOP in our 2020 letter to VA and the Georgia SAA included that HOP was failing to comply with VA’s 85/15 rule:

HOP misrepresented the ratio of veterans to non-veterans by including 17-year-old and 18-year-old students in its day school as being enrolled in its bible seminary. When Hinesville was the only approved location it would hold classes with other bible seminaries by teleconference and count those who listened in as being enrolled in the Hinesville seminary.

Source: Allegations contained in our August 2020 letter to VA and the Georgia SAA.¹⁵

Many schools are exempt from quarterly reporting if the percentage of veterans in their student body is 35 percent or fewer. As part of the application process in 2012 and 2014, HOP executed VSO Form 70-5, Statement of School Official, which certified among other statements: “The school will not certify VA students in a course when the ratio of VA to non-VA exceeds 85:15. This does not apply to courses when the total number of individuals receiving VA assistance equals 35% or less.” It is not evident in the documents produced to us that an 85/15 analysis was conducted to assess the proportion of enrolled VA students as of the school’s effective dates of approval. The allegation from a current member (at the time of our interview) is that HOP counted minors from the school’s daytime program as being enrolled in its bible seminary, an obvious ruse to circumvent 85/15 data calculations. This practice could have been uncovered if the review process required scrutiny of the physical location of enrolled students in various classes. The current federal statute does not require SAAs to conduct a sample audit of schools’ 85/15 status.

c. Aggressive recruiting on nearby military bases was not discovered.

HOP students alleged they were pressured by HOP to recruit new students at Post Exchanges, barracks, and on-base housing.

According to multiple former students, HOP sent students on base to aggressively recruit new members. Recruitments were made at a reception barracks, a base welcome center, and other on-base locations.

Source: Allegations contained in our August 2020 letter to VA and the Georgia SAA, 4–5.¹⁶

Military base authorities reportedly caught on and cracked down on HOP recruiters.¹⁷ To get around this, HOP allegedly dispatched students who were still on active duty to go on base in uniform to recruit. Several students reported being told to cease recruiting on base by non-commissioned officers and military police officers. Although all the HOP Bible Seminaries were near military installations, there was no indication in the correspondence that the SAA had

¹⁴ Veterans Education Success, “The 85-15 Rule and Related GI Bill Safeguards,” Oct. 26, 2019, available at: <https://vetsedsuccess.org/the-85-15-rule-and-related-gi-bill-safeguards/>.

¹⁵ Veterans Education Success, Letter to the U.S. Department of Veterans Affairs and Georgia State Approving Agency, RE: House of Prayer Christian Church, August 1, 2020, available at: <https://vetsedsuccess.org/letter-to-va-and-georgia-saa-regarding-house-of-prayer-christian-church/>.

¹⁶ Ibid.

¹⁷ Ibid.

contacted any of the bases to learn if they had any concerns about HOP, and the federal statutes governing GI Bill approval do not require an SAA to contact nearby military installations.¹⁸

d. Announcing inspections in advance provides a distorted view of how a school is run.

As the students, staff, and church members alleged, the SAA's onsite inspections were insufficient:

- When HOP got word of an upcoming VA inspection, students reported that HOP officials told students to say they were in class even if they were recruiting or doing other work for the church and lied to inspectors about where classes were taught.
- Desks were moved in and books added to convince inspectors that the school had functioning classrooms.
- Students were reported as attending four days a week, which would have been full-time, but they actually attended only three days a week, and church attendance was counted as attending classes.

Source: Allegations contained in our August 2020 letter to VA and the Georgia SAA.¹⁹

Inspections, such as approval visits and other oversight surveys, are seemingly announced in advance, which has the effect of allowing schools to put their best face forward. If a school seeks to deceive an SAA in order to gain GI Bill approval, the advance notice they receive before a site visit enables them time to create fabrications, as HOP students, staff, and church members allege that HOP did. The federal statutes governing GI Bill approval do not require unannounced site visits; if they did, they would allow an SAA to compare the written information submitted in the school's application to what the SAA finds onsite. Site visits should also include interviews with students and the observation of classes. While it appears site visits of the facilities were conducted prior to program approval, there is little information about the site visits in the records we received, with no indication students were interviewed.

e. HOP was able to evade complying with the statutory two-year rule.

38 USC § 3680A(e) requires a private non-college degree-granting institution to have operated continuously for two years prior to receiving SAA approval to receive GI Bill funds. The Georgia SAA accepted HOP's application for GI Bill approval in February 2012 and approved it several months later. The approval packages sent by the SAA to VA's Atlanta regional office in October 2012 stated that the "facility meets the two-year rule requirement because they had been teaching the Certificate of Advanced Discipleship program since March 2, 2009."²⁰ However, a list of graduates of this certificate program were not included in the correspondence about HOP's approval. Instead, HOP's application included a list of 41 individuals in its Bachelor's in Advanced Biblical Studies program who graduated "in the past 2 years"—ranging from 2009 to 2011. No certificate or associate degree graduates were included. The list of 41 bachelor's degree students suggested that a disproportionate number of the graduates were married couples, an

¹⁸ Currently, under 38 USC § 3676 (c)(10)(a), the SAA is supposed to ascertain that no "Federal department or agency has taken a punitive action, not including a settlement agreement, against the school for misleading or deceptive practices." The version of 38 USC § 3676 (c)(10) applicable during 2012 (and until the provision was amended in 2021) required the SAA to ascertain only "from the Federal Trade Commission whether the Commission has issued an order to the institution to cease and desist from any act or practice ..."

¹⁹ Veterans Education Success, Letter to the U.S. Department of Veterans Affairs and Georgia State Approving Agency, RE: House of Prayer Christian Church, August 1, 2020, available at: <https://vetsedsuccess.org/letter-to-va-and-georgia-saa-regarding-house-of-prayer-christian-church/>.

²⁰ While HOP completed an online form indicating the dates programs were first offered, the date it first offered its three programs was whited out and filled in by hand.

unusual enrollment statistic. For example, 16 of 19 individuals who HOP reported had graduated with a bachelor's degree in Advanced Biblical Studies in 2009 and 2010 were couples with the same last name. The documents we reviewed showed no indication the SAA had probed this peculiarity.²¹

Even more problematic is whether HOP had met Georgia requirements enabling it to operate the certificate program prior to 2012. In Georgia, nonpublic institutions must receive authorization from the Georgia Nonpublic Postsecondary Education Commission (GNPEC) before they can enroll students or offer instruction in Georgia. Religious institutions are not subject to the full approval process by GNPEC if they receive a religious exemption under Georgia statute.²² In January 2012, HOP applied for, and received, a religious exemption from the GNPEC,²³ suggesting that HOP had not been eligible to enroll students or offer instruction prior to January 2012. In its approval paperwork, HOP had informed the SAA it had offered classes since 2009, several years before it received its GNPEC exemption in January 2012. The documentation provided by the SAA in response to our public records request showed no communication with GNPEC to verify HOP's status, and the federal statute governing GI Bill approval does not require SAAs to check on a school's state approval.

²¹ One of the students we interviewed in March 2020 was married to another veteran. She told us that the church encouraged members to wed, explaining why so many students were married couples.

²² An exempt status carries no official state recognition and no published statement indicating state or GNPEC certification. See Georgia Nonpublic Postsecondary Education Commission, § 20-3-250.3, "Educational institutions exempted from application of part," available at: <https://gnpec.georgia.gov/ss-20-3-2503-educational-institutions-exempted-application-part>.

²³ The GNPEC authorizes and regulates in-state nonpublic postsecondary institutions. An institution may not advertise, enroll, seek to enroll, or offer any instruction until authorization has been granted. See Georgia Nonpublic Postsecondary Education Commission, Authorization FAQ, available at: <https://gnpec.georgia.gov/authorization/faq/authorization-faq>. All program offerings are subject to an evaluation process. However, institutions eligible for a religious exemption do not require the full authorization process. Submission of the following is required: proof of nonprofit status, a catalog or brochure describing the programs offered, a sample of credentials awarded, a completed online application, and a non-refundable application fee. An institution applying for the exemption must certify that it accepts no federal or state funds and no student who has a federal or state loan. It appears that both the authorization and exemption applications are conducted entirely online. See Georgia Nonpublic Postsecondary Education Commission, "How Do I Apply for New Religious Exemption?" available at: <https://gnpec.georgia.gov/authorization/exemption/religious-exemption/how-do-i-apply-new-religious-exemption>.