

The California State Approving Agency for Veterans Education

The California State Approving Agency for Veterans Education (CSAAVE) is part of the California Department of Veterans Affairs (CalVet), operating under the authority of the U.S. Department of Veterans Affairs (USDVA) through mutual agreement.

CSAAVE is responsible for the oversight and approval of California institutions offering education programs, apprenticeship and on-the-job training, and license and certification exams. Institutions that elect to participate in G.I. Bill education and training must comply with the Code of Federal Regulations, as well as all federal, state and local laws. CSAAVE describes its mission as “to protect the GI Bill by preventing waste, fraud and abuse of GI Bill money, by promoting quality education through evaluating and monitoring education and training programs offered in California.”

Under the authority CSAAVE derives from the USDVA, it may take the following formal actions:

Approval of an application of an accredited or nonaccredited school, training facility or establishment, when the school, facility, or establishment and its programs are found to have met the criteria and additional reasonable criteria prescribed by law.

Suspension when the evidence of record establishes that the course or licensing or certification test fails to meet any of the requirements for approval. Suspension is a temporary act that allows a school or facility 60 days to correct noted deficiencies.

Disapproval of a course or licensing or certification test, if any of the requirements for approval are not being met and the deficiency cannot be corrected within a period of 60 days, pursuant to 38 CFR 21.4259 (a)(2).

Denial of an application of a school or a program, when said application fails to include all relevant and required information for a grant of approval.

Recent History

Last year, CSAAVE began suspending a number of colleges for a variety of violations of federal law. The USDVA began to weigh in with its objections, arguing that CSAAVE was overstepping, and that its function was redundant with the state’s Bureau of Private Postsecondary Education. Many of the suspensions involved the operation in California of satellite or distance learning offices as actual campuses, allowing the students to claim a housing allowance based on the school’s local cost-of-living, an arguable abuse of the G.I. Bill program that allows for-profit schools to entice veterans to their programs for non-educational reasons.

Three of those affected colleges sought an injunction against the state’s suspension. USDVA issued a guidance letter that directed CSAAVE to defer, effectively, to California’s Bureau for Private Postsecondary Education. The state agreed to abide by a guidance letter issued by USDVA and reinstated approval for the three colleges, which ended the litigation.

Within a few months, the Education Corporation of America abruptly shut down its schools nationwide, in some cases just weeks after starting new courses. In California, they did so in violation of a state law that requires 30 days’ notice. Approximately 400 California veterans were affected by this abrupt closure. The ECA schools, most of them known as “Brightwood College” in California, had been under scrutiny since 2016, when their accreditor lost

The California State Approving Agency for Veterans Education

Department of Education recognition. CSAAVE suspended the Brightwood College facility in Bakersfield in August 2018, began the process of suspending its Chula Vista and Fresno locations and had begun preparing the suspension of other locations, all of which was either blocked or overturned by the USDVA's demand.

In the midst of this, the USDVA's Inspector General issued a scathing report on the department's oversight of SAA program monitoring, and California's Bureau of Private Postsecondary Education, to which the USDVA's guidance had devolved most oversight, was the subject of further news coverage about alleged poor performance and failure to properly oversee the schools within its jurisdiction. The Bureau, despite USDVA's insistence that its approvals should stand as Title 38 approvals, has said it has no power to enforce federal law, while the USDVA's guidance indicates its routine licensing activity under state law should stand as sufficient oversight and enforcement of federal law.

There are, therefore, significant unresolved questions about the future of state oversight of G.I. Bill-participating institutions, and the interaction of those agencies responsible for that oversight.