



DEPARTMENT OF VETERAN AFFAIRS
Veterans Benefits Administration
Education Service
Washington, D.C. 20420

09/12/2025

Denise McNulty
SCO Assistant Director of FA
Bridgewater State University
45 School Street
Bridgewater, MA 02325

Facility Code: 1-1-9201-21

Dear Denise McNulty,

A compliance survey was recently conducted on 08/21/2025 at your institution. Thank you for the kindness and cooperation you extended to me during the survey process. Attached you will find the narrative report of the survey findings, including any discrepancies found during the visit. This attachment will provide more specific information concerning the individual discrepancies.

If you have questions or require assistance with any VA regulations or requirements, please contact the Education Liaison Representative for your state by email at EastRegionApprovals.VBABUF@va.gov or contact the Education Hotline at 888-GIBILL-1 (888-442-4551), or [Ask VA](#).

Sincerely,

A handwritten signature in black ink, appearing to read "James Werner".

James Werner
Education Compliance Survey Specialist - Contractor
Saint George Consulting, LLC
James.Werner@va.gov
James.Werner@saintgeorgeconsulting.com

Enclosure: Narrative Report

Bridgewater State University

45 School Street
Big City, TX 00000

Facility Code: 1-1-9201-21

I. GENERAL

The purpose of a Compliance Survey is to ensure that approved programs are compliant with all applicable provisions of Title 38, United States Code (USC) § 3693 administered by VA.

A routine Compliance Survey was conducted onsite at Bridgewater State University (referred to throughout as the ETI) by Education Compliance Survey Specialist (ECSS) James Werner. The official notification of the survey was delivered via email to Denise McNulty on August 6, 2025. An entrance briefing was held on August 20, 2025 and an exit briefing was held on August 21, 2025 with ETI officials.

Date of Last Approval: The date of last approval action found was March 11, 2024. This date is within the 36-month limitation.

Student Sampling: The Active Student Count was 275. In accordance with the AC&L FY21 Compliance Survey Strategy and Guidance, the initial sample size was twenty (20) VA beneficiaries and two (2) randomly selected non-VA beneficiary records. The sample distribution was based on the available records and included one (1) - Chapter 30 record, sixteen (16) - Chapter 33 records, two (2) - Chapter 35 records, and one (1) - Chapter 1606 record.

Non-Veteran Record Review: Two (2) Non-VA student files were reviewed to verify that the cost of tuition and fees for VA beneficiaries was not greater than the charges for similarly circumstanced students. The findings were consistent with the VA beneficiary records. No issues were identified.

Prior Compliance Survey Information: The compliance survey conducted in FY24 covered through December 21, 2023, and was on-site; the survey was reviewed and found to have the following discrepancies:

- Line 6: Multiple issues were found leading to payments and overpayments.
- Line 12: Two issues found that lead to payments.

Current Survey: The review period for this routine, on-site Compliance Survey covered the period January 17, 2024 through July 1, 2025

ETI Information: Bridgewater State University is an accredited, public, Institution of Higher Learning (IHL).

Per the Web Enabled Approval Management System (WEAMS) the ETI has 3 School Certifying Officials (SCOs), and 0 Read-Only SCOs. During the Compliance Survey the list of SCOs on WEAMS was reviewed and found to be accurate.

Prior Credit (38 CFR 21.4253, 21.4254, 21.4263): Prior credit was reviewed, and credit was granted where appropriate. Bridgewater State University requires all students to provide official transcripts and military training

records for evaluation. Evaluation is sent to the Registrar's Office to determine if training is equivalent and granted. The degree audit report and transcript do reflect transfer credit granted. The ETI was found to be within compliance standards.

GI Bill® Feedback Tool: The GI Bill® Feedback Tool system was reviewed prior to conducting the Compliance Survey and no complaints were found in the current review period.

Entrance Briefing: The entrance briefing was conducted on-site on August 20, 2025. The following individuals attended this briefing:

	Name	Title	SCO
1	Denise McNulty	SCO Assistant Director of FA	Primary

During the Entrance Briefing, the following topics were discussed:

- ECSS explained the survey's purpose, scope, and methodology.
- SCO provided guidance to ECSS regarding the organization and layout of the student records

II. DISCREPANCIES (VA FORM 22-1934: AREAS OF REVIEW)

The following discrepancies were found within areas of review enumerated in VA Form 22-1934.

Type: Line 6: THE FACILITY ACCURATELY AND PROMPTLY REPORTED ENROLLMENT, TUITION AND FEES, LESSONS SERVICED, FLIGHT TRAINING HOURS OR APP/OJT HOURS (38 CFR 21.4203(e)(f)(g), 21.4204, 21.7156, 21.9735)

Facts: The following beneficiaries did not have their Tuition & Fees set up after the initial certification:

1. Macdonald(x-7465) CH. 33
 - Facility Reported: 1/22/25 – 5/13/25 - \$0.00 Tuition & Fees
 - Should have been: 1/22/25 – 5/13/25 - \$5,487.00 T&F
2. Solomon(x-5759) CH. 33
 - Facility Reported: 1/22/25 – 5/13/25 - \$0.00 Tuition & Fees
 - Should have been: 1/22/25 – 5/13/25 - \$14,137.50 T&F

Evaluation: Error by School Certifying Official

Recommendation: ECSS and SCO made changes onsite in Enrollment Manager. SCO agreed to set up weekly checks on beneficiaries to ensure correct certifications are completed.

Type: Line 26: THE FACILITY HAS CORRECTED AND NOT REPEATED ANY DISCREPANCY FOUND ON THE PRIOR SURVEY, OTHER THAN AN OCCASIONAL CLERICAL ERROR (38 CFR 21.4210(d))

Facts: The following discrepancy was filed due to the prior survey having payment issues with a Line 6 discrepancy.

Evaluation: Error by School Certifying Official

Recommendation: SCO understood the importance of having the correct certifications for beneficiaries and will implement a check system that ensures correct certifications to the VA.

III. SUMMARY

Exit Briefing: An exit briefing was conducted on-site on August 21, 2025. The following individuals attended this briefing:

	Name	Title	SCO
1	Denise McNulty	SCO Assistant Director of FA	Primary

At the Exit Briefing, the following topics were discussed:

- ECSS outlined the survey process
- ECSS presented any findings and gave the SCO(s) the opportunity to ask questions and provide further information
- ECSS expressed gratitude to the SCO(s) for their hospitality and commendable record-keeping

Additional Assistance Provided: The ECSS thanked the SCOs for great record keeping. The SCOs were very commending and respectful. The SCO handbook was provided as well as the AskVA link and the GI Bill® Education Hotline. The ECSS and SCOs had a discussion during the exit interview about uploading the proper files to the Education Upload Portal that would send the renewal documents straight to the SAA/ELR. The SCO was very commending and understanding of the new process of uploading approval documents. Secondary certifications will be completed for all CH. 33 students moving forward. All changes to any student's credit hours or date changes will be corrected in EM. All Yellow Ribbon payments will be checked prior to submission to ensure accuracy.

- ECSS provided the links to the current SAA and ELR contact information
- ECSS provided the link to the SCO Resource Portal as well the link to access the Office Hours webinars
- ECSS recommended using the Online School Certifying Official Handbook for any information needed in regards to certifying and related topics.

Beneficiary Interviews: This is not applicable for this ETI.

Review of 85/15 Compliance and 35% Exemption Waiver (38 CFR 21.4201(d)): Per the Required School Information provided during the Compliance Survey the ETI's total enrollment was 10,348. This total enrollment was made up of 304 VA beneficiaries and 10,044 non-VA beneficiaries.

The ETI has a 35% Exemption. All programs are approved as of 6/13/2024 and the percentage is 2.8%. As such, 85/15 documents were not collected or reviewed for this compliance survey.

Enrollment Limits: The State Approving Agency has not established any enrollment limits in the Notice of Approval at this time for this ETI. The ETI was found to be within compliance standards.

Repeat Discrepancies and/or Issues: A referral was submitted to the ELR of jurisdiction for additional training after the following repeat discrepancies were found:

Line 6: The SCO did not report change in Tuition and Fees for beneficiaries which was found as a discrepancy in the previous survey. The SCO received previous training and due to the short time limit between surveys, a referral was not made. The SCO understood the issue and will implement a check system at the ETI to ensure all certifications are correct and updated when appropriate while still abiding under VA regulation.

Review of Advertising Materials: The ETI's advertising was reviewed (social media, ETI website, and catalog). At the conclusion of the review, no misleading nor deceptive advertisings were found. The ETI was found to be within compliance standards.

Power of Attorney and Non-assignability of Benefits (38 CFR 21.4146, 21.9680): ETIs and training establishments are prohibited from negotiating VA educational assistance benefit payments. All student payments were issued to personal accounts by direct deposit. There were no paper checks issued. An inquiry was made by the ECSS, and the SCO stated the ETI did not have Power of Attorney for any VA beneficiary. The ETI was found to be within compliance standards.

Independent Study (38 CFR 21.4267): The ETI is approved for independent study and was found to be within compliance standards.

Practical Training (38 CFR 21.4265): The ETI is approved for practical training. The ETI was found to be within compliance standards.

Cooperative Courses and Farm Cooperative Courses (38 CFR 21.4233, 21.4257, 21.4264): The ETI is not approved for cooperative courses. The ETI was found to be within compliance standards.

Two-Year Period of Operation for Branches (38 CFR 21.4251): This is not applicable to this ETI.

Tutorial Assistance (38 CFR 21.4236, 21.9685): The ETI does not have any participants in the Tutorial Assistance program through the Department of Veterans Affairs. The ETI was found to be within compliance standards.

Owner/Officer Restriction and Conflicting Interests Certification (38 CFR 21.4005, 21.4202(c), 21.5001, 21.7305, 21.7805, 21.9770): The ETI is a public institution and therefore this certification is not applicable.

Contractual Arrangements (38 CFR 21.4233(e)): The ETI does not offer any courses under contract. The ETI was found to be within compliance standards.

Advance Pay (38 CFR 21.4203, 21.9715): The ETI is approved to receive advance pay checks for delivery to students. However, none of the eligible students were utilizing Advance Pay at the time of this survey.

Nonduplication of Benefits (38 CFR 21.4020, 21.4022, 21.5022, 21.5023, 21.7143, 21.7642, 21.9690): No duplication of benefits was found during this survey. The ETI was found to be within compliance standards.

Yellow Ribbon (38 CFR 21.4254(c)): The ETI does not participate in the Yellow Ribbon (YR) program.

Recruiting Practices (38 U.S.C. 3696(d)(1)): The ECSS reviewed the information provided by the ETI for this survey and found no evidence of fraudulent or unduly aggressive recruiting practices. The ETI was found to be within compliance standards.

School Certifying Official (SCO) Beneficiaries: CFR §21.9675(d) states the VA will not pay benefits for courses certified to the VA by the individual taking the course: VA systems were reviewed to identify if any SCOs have utilized VA benefits at Bridgewater State University and it was found that no SCOs have utilized VA benefits at the ETI. The ETI was found to be within compliance standards.

Review of Public Law 115-48 (Colmery Act)- Priority Enrollment: The ETI does not offer priority enrollment. The ETI was found to be within compliance standards.

Review of Annual Reporting Fees: PL 111-377 (Section 204) states that any reporting fee paid to an educational institute shall be utilized by such institution or committee solely for the making of certifications or for otherwise supporting programs for Veterans. The funds are generally used for Veteran and Military family events that promote college success. Student engagement, equity, and student support services. The ETI was found to be within compliance standards.

PL 115-48 (section 304) states that if an ETI receives reporting fees for 100 or more eligible students, then the reporting fees paid to the ETI cannot be used for, or merged with, the ETI's general fund. The ETI did not receive payment for more than 100 students, but does maintain a separate fund account. The ETI was found to be within compliance standards.

GI Bill® Trademark: In accordance with Executive Order 13607(f), The ETI's usage of the trademarked phrase "GI Bill" was reviewed (social media, ETI website, and catalog). The ETI was found to be within compliance standards. GI Bill® is a registered trademark of the U.S. Department of Veterans Affairs (VA). More information about education benefits offered by VA is available at the official U.S. government website <https://www.benefits.va.gov/gibill>

Public Law 116-315, Section 1018: A signed statement of compliance was collected during this compliance visit. The ETI was found to be within compliance standards.

Principles of Excellence (PoE): The ETI does participate in Principles of Excellence. A signed statement of compliance was collected during this compliance visit. The ETI was found to be within compliance standards.

Recommendation for Future Compliance Survey: It is recommended this ETI be resurveyed as required by Title 38, U.S.C § 3693.

Compliance Survey Close-out Notice: Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of additional statements in this report concerning your ETI's specific practices and procedures cannot

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be construed as acceptance, approval, or endorsement of those specific practices and procedures by the Department of Veterans Affairs. The successful completion of this Compliance Survey does not relieve your ETI of its obligation to comply with all statutory and regulatory provisions governing USC Title 38 Veterans Benefits programs.

This Compliance Survey Narrative was completed on September 11, 2025 by James Werner.

A handwritten signature in black ink, appearing to be 'JW', with a stylized flourish extending from the bottom right.

James Werner

Education Compliance Survey Specialist
Saint George Consulting