

**Analysis of**  
***Loomis v. Collins***  
**\_\_ Vet. App. \_\_ (2025)**  
May 8, 2025

**Bottom Line up Front:**

The opinion from the Court of Appeals for Veterans Claims (CAVC) held that VA education benefits can only be used for flight school to earn a private pilot's license if the program is either:

1. Approved by the state or by VA, or
2. Part of a college's curriculum and is "constructively approved" by the Federal Aviation Administration (FAA).

Meeting FAA requirements alone does not qualify. This decision limits how Veterans can use their education benefits for private pilot training.

**What happened in *Loomis*:**

- Mr. Loomis, an Air Force Veteran, worked for a private energy defense contractor after leaving service.
- To qualify for a promotion, Mr. Loomis needed a private pilot's certification and applied to use his VA education benefits at MidCoast Aviation Services, a private flight school.
- VA denied the claim for education benefits because MidCoast Aviation was not approved by the state of Georgia, VA, or an institution of higher learning (IHL).
- Mr. Loomis appealed to CAVC, arguing that FAA standards should qualify the program for VA benefits.

The Court examined how two education laws interact for flight training and determined that FAA approval only counts if the school is part of a college degree program.

**What the Court Decided:**

VA education benefits for private flight school, the program must meet one of two conditions:

1. Be approved by the state or VA, or

2. Be “constructively approved” by the FAA, but **only** if the course is part of a college degree program at an IHL.

**Why *Loomis* is important:**

- Confirms that VA’s current policy is correct. FAA approval alone isn’t enough to qualify a program for VA enrollment and payment.
- Reinforces limits on Veterans’ ability to use GI Bill benefits for private pilot training.

**Best Practices for VSOs:**

- **Check approvals:** Verify if the flight school is a state approved, VA approved, or part of a degree program before filing.
- Advise Veterans that FAA approval alone does not qualify a school for VA GI Bill funding.
- Submit proof of a school’s approval source (state, VA, or college curriculum) with the application for benefits.