Voluntary Education Program
Readiness (Force Education & Training)

DoD Institutional Compliance Program: One Year In, How’s It Been?

March 2018
Agenda

• Introductions
• Strategic Plan
• FY17 Institutional Compliance Program (ICP)
• Iteration 1 Overall Results
• Iteration 1 Findings & Notional Examples
• Way Ahead
• Questions
Vision Statement
“Shaping quality voluntary educational experiences to foster better service members, better citizens”

Mission Statement
“Champion policies, programs, and partnerships that enable access to quality postsecondary educational opportunities, empower informed service member decision-making, shape meaningful personal and professional pathways, and drive military student success in higher education.”

Focus Area One
Promote Quality Educational Opportunities

Focus Area Two
Ensure Military Student Readiness and Success

Focus Area Three
Enable a Viable VolEd Community

Focus Area Four
Cultivate a Culture of Organizational Effectiveness
Institutional Compliance Program

- Inaugural year of a modernized program
- Leveraged over 24,000 pieces of data, conducted a focused analysis of 250 institutions, provided feedback
- Some common findings of non-compliance across the sample population
- Providing numerous opportunities to apply lessons learned
- Making leaps forward in effectiveness and efficiency to create a viable compliance program for the long term
FY17 Institutional Compliance Program
Overarching Approach

- Address Government Accountability Office (GAO) concerns
- Minimize burden on institutions & Military Services
- Execute a cursory look at entire population of DoD Memorandum of Understanding (DoD MOU) institutions
- Down-select to 250 DoD MOU institutions for focused evaluations
- All scoring and analysis result in relative rankings
- Intent is to provide feedback to improve compliance

All efforts focused on creating a *Culture of Compliance*
2017 ICP Process
(The Plan)

2,700+ DoD MOU

Risk Factor Evaluation (50)
Random Selections (200)

Iteration 1 Evaluations
Web Verification
Self-Assessment
Student Surveys

250 ICP

Iteration 2 Evaluations
Scenario-Based Assessment
Full Self-Assessment
ESO Surveys

Site Visits
(if necessary)

5

25
2017 Selection Results

All DoD MOU Institutions

Public: 61%
Private, For-Profit: 10%
Private, Non-Profit: 29%

250 ICP Institutions

Public: 60%
Private, For-Profit: 10%
Private, Non-Profit: 30%

250 ICP Institutions chosen via the risk factor evaluation and random selection closely match overall demographics
First year of the new compliance program addressed nearly half of the Tuition Assistance (TA) funding and the student population.
Iteration 1 Areas Examined

• Recruiting, Marketing, & Advertising
  – Are Educational Institutions complying with legal and ethical guidelines as expressed in the MOU?

• Financial Matters
  – Are Service members provided access to qualified and trained staff at Educational Institutions who can answer financial questions and help Service members make informed decisions?

• Accreditation
  – Are Educational Institutions accredited by a body recognized by the Department of Education and complying with programmatic accreditation requirements?

• Post-Graduate Opportunities
  – Are Educational Institutions providing accurate information on post-graduate employment opportunities, so that students can make informed decisions?

Risk factor evaluations and Iteration 1 evaluations utilized over 24,000 pieces of data
Iteration 1 Overall Results
Iteration 1 Summary

Non-Compliant Findings

Out of 47 data elements, 26 institutions had 8 non-compliant findings.
Iteration 1 Summary

Non-Compliant Findings by ICP Category

<table>
<thead>
<tr>
<th>ICP Category</th>
<th>% of Non-Compliant Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recruiting, Marketing &amp;</td>
<td>14%</td>
</tr>
<tr>
<td>Advertising</td>
<td></td>
</tr>
<tr>
<td>Financial Matters</td>
<td>19%</td>
</tr>
<tr>
<td>Accreditation</td>
<td>8%</td>
</tr>
<tr>
<td>Post-Graduate Opportunities</td>
<td>16%</td>
</tr>
</tbody>
</table>
Iteration 1 Summary

Non-Compliant Findings by ICP Category

- 98% of the institutions had at least one Non-Compliant response in Financial Matters.
Iteration 1 Findings
& Notional Examples
Recruiting, Marketing, and Advertising

• **Most Common Areas of Concern:**
  – DoD and/or Military Service insignias and/or logos being displayed on institution websites, implying a tacit endorsement by the DoD
    • ED 34 C.F.R. 668.71: “... any statement that has the likelihood or tendency to deceive.”
    • DoDI 1322.25 – “Use unfair, deceptive...devices...including misleading advertising...”
  – Incomplete guidance on TA processes, including:
    • Application process
    • Links to Service education portals
    • Guidance directing students towards ESOs and other military education personnel

• **Potential Ramification:**
  – Service members could receive inaccurate/incomplete/confusing information to use in their educational decision making
VolEd University has supported the educational goals of our men and women in uniform since its inception in 1985. We offer support and counseling services to help veterans, active duty Service members, spouses, and dependents successfully receive all of your military benefits.
Common Non-Compliance

VolEd University

- Admissions
- Financial Aid
- Tuition & Fees
- Military TA Program
- Counseling
- Military Portals
- Events
- Q & A

Location
Hesburgh Hall, A113

Hours
Monday-Friday: 8am – 5pm

QUICK LINKS
Most Common Areas of Concern:
- Lack of transparency regarding numerous aspects of the financial aid process, including:
  - Timelines
  - Total cost of attendance
  - Differentiation between tuition and fees
- Website tuition information does not match the information provided via the institution’s DoD MOU application
- Lack of evidence relating to financial aid advisement

Potential Ramifications:
- Service members could receive inaccurate/incomplete/confusing information to use in their educational decision making
- Could lead to unwanted financial burden
Tuition and fees are based on residency status, class level and the number of course units taken.

**Estimated Tuition and Fees for Full-Time Students, 2018-2019**

The following table illustrates the tuition and fees for full-time undergraduate students:

<table>
<thead>
<tr>
<th></th>
<th>On-Campus</th>
<th>Off-Campus</th>
</tr>
</thead>
<tbody>
<tr>
<td>Undergraduate Tuition</td>
<td>$250/credit</td>
<td>$250/credit</td>
</tr>
<tr>
<td>Books &amp; Supplies</td>
<td>$1,000/term</td>
<td>$1,000/term</td>
</tr>
<tr>
<td>Food &amp; Housing</td>
<td>$9,000/year</td>
<td>$13,779/year</td>
</tr>
<tr>
<td>Technology Fee</td>
<td>$300/credit</td>
<td>$300/credit</td>
</tr>
<tr>
<td>Transportation &amp; Other Fees</td>
<td>$1,337/term</td>
<td>$2,997/term</td>
</tr>
<tr>
<td><strong>Total (30 credit, two-term year)</strong></td>
<td><strong>$30,174</strong></td>
<td><strong>$38,273</strong></td>
</tr>
</tbody>
</table>

**Deadlines**

<table>
<thead>
<tr>
<th>Date</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>April 1, 2018</td>
<td>Applications accepted</td>
</tr>
<tr>
<td>April 23, 2018</td>
<td>Accept admission deadline</td>
</tr>
<tr>
<td>May 1, 2018</td>
<td>Official transcripts due</td>
</tr>
</tbody>
</table>
How much does it cost to attend VolEd U?

First, tell us a bit about yourself.

*Name

Enter your name

*Program modality

Online

*Location

Alabama

*Preferred area of study

Select degree level and type

*Veteran status

Active Duty

*Where do you plan to live?

On Campus

*Contact information

Enter your phone number

OK, Ready to Continue!
Best Practice

VolEd University

Financial Aid

Steps to Apply for Aid
1. Apply for Admissions
2. Complete the FAFSA
3. Receive your admissions letter
4. Complete financial aid application online
5. Submit all financial aid forms
6. Set-up student email
7. View your award
8. Accept your aid

Types of Financial Aid
- Grants
- Work-Study
- Loans
- Scholarships

Deadlines

<table>
<thead>
<tr>
<th>Date</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>February 15</td>
<td>FAFSA application due</td>
</tr>
<tr>
<td>March 1</td>
<td>Complete IDOC</td>
</tr>
<tr>
<td>March 15</td>
<td>Financial aid notifications sent</td>
</tr>
<tr>
<td>June 1</td>
<td>Scholarship application deadline</td>
</tr>
</tbody>
</table>
Attention Military Students
VolEd University offers first-rate educational services for our men and women in uniform. We know the military student, and the challenges you face, so call 1-888-867-5309 to find out how we can help you!

Your Fast-Track to a Diploma
Enjoy same day application and enrollment as a Veteran or Active Duty.

Paying for your Degree
Our advisors will work with you step-by-step to make sure you get the right degree at the right price. Active Duty and Veterans are pre-approved for multiple loan programs, and have access to a number of VolEd University Scholarship programs. Call 1-888-867-5309 to speak with a Financial Aid Advisor today!

Special Note:
The MS Cybersecurity program does not accept Title IV loans, and is a cash only program.
Accreditation

• Most Common Area of Concern:
  – Lack of current and/or easily accessible information pertaining to programmatic accreditation

• Potential Ramifications:
  – Students may not be aware they are pursuing programs that are not properly accredited
  – Without proper programmatic accreditation, students may not be employable in their desired field without further coursework
University Accreditation
VolEd U. is accredited by the Regional VolEd College and University Commission, commonly referred to as RVECUC. Our next reaffirmation of accreditation visit will be held in Spring of 2025. As outlined in the Commission Action letter, the following schedule is in place:

<table>
<thead>
<tr>
<th>Date</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spring 2019</td>
<td>Progress Report</td>
</tr>
<tr>
<td>Spring 2020</td>
<td>Mid-Cycle Review</td>
</tr>
<tr>
<td>Spring 2024</td>
<td>Off-site Review</td>
</tr>
<tr>
<td>Spring 2025</td>
<td>Accreditation Visit</td>
</tr>
</tbody>
</table>

Program Accreditation
Several programs at VolEd U. have received discipline-specific accreditation. The list below provides links to the accrediting agency websites where information regarding requirements for this external accreditation can be found.

- The B.A. and M.A. in Music are accredited by the National Association of Schools of Music. ([view accreditation letter here](#)).
- The M.S. in Speech-Language Pathology is accredited by the Council on Academic Accreditation in Audiology and Speech-Language Pathology. ([view accreditation letter here](#)).
- The Master's in Social Work is accredited by the Council on Social Work Education. ([view accreditation letter here](#)).
- The College of Business and Economics is accredited by the Association to Advance Collegiate Schools of Business (AACSB).
- All of the university's programs for teaching and services credentials are approved by the VolEd State Commission for Teacher Credentialing.
Common Non-Compliance

• *Does the institutional accrediting agency’s website verify the accreditation status of the institution?*
  
  – No, the institution’s accrediting agency is no longer recognized as an accrediting agency by the Department of Education.

• *Does the institution provide additional information on programmatic accreditation?*
  
  – In many cases, an institution’s website contains no programmatic accreditation information
  
  – When requested in the self assessment, no data was provided
Most Common Area of Concern:

- Inability to identify knowledgeable points of contact familiar with military students, including:
  - TA vs. VA funding
  - Student loan debt counseling and/or management
  - Academic counseling
  - Job prospects
  - Post-graduation counseling

Potential Ramification:

- Service members could receive inaccurate/incomplete/confusing information to use in their educational decision making
Best Practice

• Self-Assessment Question:
  – “Provide evidence that the institution provides a point of contact (POC) knowledgeable of the military Tuition Assistance (TA) program, ED Title IV funding, ....”

• Best Practice Response:
  – Identified the duties and responsibilities of the Associate Registrar for Transfer and Military Services
  – Included a position description, detailing required knowledge, skills, and abilities
Common Non-Compliance

• Self-Assessment Question:
  – “Provide evidence that the institution provides a point of contact (POC) knowledgeable of the military Tuition Assistance (TA) program, ED Title IV funding, ....”

• Non-compliant Response:
  – http://www.noncompliantu.edu/veterans
  – When accessed, website gives “page not found” error
  – Unable to determine if the institution has knowledgeable POCs
Way Ahead
Way Ahead

• Implement improved correspondence mechanisms
  – Institutions should maintain Compliance POC information within DoD MOU site; over 60% currently not up to date

• FY17 ICP Institutions provide their Corrective Action Plan (CAP) and begin implementation of their CAP

• Execute FY18 Cycle of ICP with a new set of 250 institutions

• Continue to apply lessons learned to improve the overall process

Maintain the focus on the Culture of Compliance
2018 ICP Process
(The Plan)

2,700+ DoD MOU

Risk Factor Evaluation (50)
Random Selections (200)

250 ICP

Iteration 1 Evaluations
Web Verification
Self-Assessment

Iteration 2 Evaluations
Scenario-Based Assessment
Student Surveys
ESO Surveys
ICP Review Cycle
(Schedule)

- An announcement letter kicks off each institutional review
- Report for institutions identifying any potential finding(s), condition(s), cause(s), and recommendation(s)
- ICP participants with no issues will be exempt from random selection for three years, and risk-based selection for one year
- Typical fiscal year schedule:

<table>
<thead>
<tr>
<th>Oct - Jan</th>
<th>Feb – May</th>
<th>Jun - Jul</th>
<th>Aug - Sep</th>
</tr>
</thead>
<tbody>
<tr>
<td>On-Site Assessment Reports</td>
<td>Iteration 1 Assessments (250)</td>
<td>Iteration 1 Reports for Institutions (225)</td>
<td>Iteration 2 Reports for Institutions (20)</td>
</tr>
<tr>
<td>Initiate CAP On-Site</td>
<td>Correspond with ICP Participants</td>
<td>Initiate CAP Iteration 1</td>
<td>Initiate CAP Iteration 2</td>
</tr>
</tbody>
</table>
Questions