



United States Department of Defense
Office of the Under Secretary of Defense
Personnel & Readiness
Voluntary Education Institutional Compliance Program
Overarching Lessons Learned Report

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Executive Summary

Under the direction of the Under Secretary of Defense for Personnel and Readiness (USD P&R) and the Assistant Secretary of Defense for Readiness (OASD(R)), the Department of Defense Voluntary Education (DoD VolEd) program within the Office of the Deputy Assistant Secretary of Defense for Force Education and Training (ODASD(FE&T)) oversees the Tuition Assistance (TA) program that provides education benefits to active duty and reserve Service members. During the first three years of the Institutional Compliance Program (ICP), the TA program on average funded over 733,000 courses at a cost of approximately \$488,000,000 annually.

Per DoD policy, in order to participate in the TA program and receive TA funding, educational institutions must sign a Voluntary Education Partnership Memorandum of Understanding (MOU) with the DoD. To be eligible to enter into such MOU, an educational institution must be accredited by an accrediting organization recognized by ED, approved for VA funding, and certified to participate in federal student aid programs through the ED under Title IV of Public Law 89-329, also known and referred to in this instruction as the Higher Education Act of 1965.

By signing the MOU, institutions agree to a set of behaviors, processes, and policies – all focused on improving program delivery to Service members. For example, the MOU requires educational institutions to avoid aggressive recruiting practices, provide clear and consistent information on pricing and loans available to military students, and follow DoD rules related to base access. The DoD VolEd MOU Partnership Institutional Compliance Program (ICP) is a full-scale, risk-based compliance program that assesses institutional compliance with these standards, in order to reduce risks associated with non-compliance.

Each year, the ICP team considered the entire population of MOU signatories, leveraged over 24,000 pieces of data to narrow the population from over 2,700 to 250, and then conducted an in-depth assessment on those 250 institutions. The team then provided critical feedback to those institutions to enable them to implement Corrective Action Plans (CAPs) to improve their individual level of compliance with the tenets of their MOUs.

The ICP team found a number of general trends among the institutions being examined. This report will highlight some of these trends, and offer recommendations for best practices in those areas so that all institutions can improve their level of compliance, even if they were not part of any of the first three assessment cycles.

Purpose

The purpose of this document is to provide all MOU signatories with insights and lessons that the VolEd Office learned through executing the first three annual cycles of the ICP. While the VolEd Office provided specific feedback to each institution assessed from 2017-2019, this document can provide overarching insights to the remaining institutions who have not yet been a part of the assessment process. This will enable proactive institutions to perform an internal review of their compliance, and potentially take actions to improve that compliance.

Selection and Assessment Process

The ICP team selected a total of 250 institutions to evaluate using a combination of outcome-based results from the previous year and random sampling from the overall population. The DoD requested that each selected institution fill out a self-assessment tool and return it along with any supporting evidentiary documentation. While the institutions were fulfilling this request, the ICP team examined each institution's public-facing website using a web verification assessment tool. The ICP team combined these two data sets to form an overall assessment of each institution's level of compliance with the tenets of the MOU.

The self-assessment tool assesses aspects of MOU compliance and helps identify potential areas of concern. This tool focuses on internal controls and processes that institutions may or may not have, many of which are specifically required by the MOU.

The web verification assessment tool focuses on determining if the data, content, and imagery posted by selected institutions align with the expectations and requirements set forth in the MOU and other federal education guidelines.

Compliance-Related Findings Analysis

Across the first three ICP cycles, the team observed a number of trends and findings. First and foremost, every assessed institution had at least one compliance-related finding. Therefore, by distributing the feedback reports, and allowing the institutions to develop and execute CAPs, DoD has provided every institution in the assessed population (over 700 partner institutions) with the opportunity to contribute to a collective increase in the level of compliance across the enterprise.

Additionally, there were a number of trends across the assessed population, in their general findings, as well as their specific focus area assessments. All of these general findings and trends have been shared with all partner institutions in a public forum, and are detailed below.

General Trends

From 2017-2019, the ICP team observed a number of general trends across the assessed population, detailed as follows:

- **Lack of updated information:** Over 2/3 of all institutions have not updated their contact information, tuition information, or both on the MOU application at dodmou.com. This crucial information ensures Service members have the ability to make educational choices with full information, making this not only an MOU requirement, but also in an

institution’s best interest to keep current. Additionally, almost 70% of institutions posted financial information in their MOU application via dodmou.com that did not match financial information on their own website.

- **Inconsistent and/or improper responses:** Institutions had varying interpretations of some requests in the self-assessment and therefore provided multiple mixes of documentation and supporting evidence. This impacted the ICP team’s assessment, as many did not have clear or concise evidence in support of the question, so the ICP team was unable to verify the institution’s compliance with the MOU.
- **Lack of supportable evidence:** Multiple institutions were unable to provide evidence showing that they had internal management controls in place. Specifically, many institutions provided a brief description of the qualifications of the individuals currently occupying the advisory positions, but did not show how they would systemically ensure that future occupants would meet the same standards. The ICP team also observed policies that did not align with their web content, indicating the potential for an internal misalignment between policy and practice.
- **Continued infringement on “Official Seals”:** In spite of numerous official reminders and memoranda, the ICP team found that several institutions continue to display the “Official Seals” of the DoD and/or the Military Departments and their Services (i.e., Army, Navy, Air Force, and the U.S. Marine Corps) on institution websites, which constitutes the unauthorized use of DoD intellectual property and impermissibly implies DoD endorsement of these institutions and their programs.
- **Accreditation issues:** Numerous assessed institutions had an issue with accreditation – either they failed to list all programmatic accreditation on their websites, failed to supply information from outside sources verifying the accreditation of their programs, or simply made information on the accreditation of their programs difficult to find online. Unfortunately, being deficient in this regard harms the deficient institution more than anyone, as Service members who require programmatic accreditation and outside vetting to work in a chosen field could potentially dismiss the institution when they are unable to easily find information on the accreditation of the institution’s programs.

Focus Areas

The VolEd Office seeks to find an equilibrium where Service members are afforded ample opportunities to pursue their higher education goals, while at the same time providing these same Service members protection against unfair or deceptive practices.

With the overarching goal of good fiscal responsibility, the VolEd Office seeks to enable a viable VolEd community where Service members can make fully informed decisions about their respective futures and apply financial resources effectively. With this in mind, the ICP team sorted and organized data collected during the three assessment cycles into four categories. Each of these categories can be directly tied to the goal of enabling fully informed decisions. The following sections will define each category, describe the attributes of each, generally discuss the compliance-related findings, and offer a summary of some of the best practices observed during the ICP team’s evaluations. The best practices displayed below should be viewed as generic

approaches to compliance, and should not be considered as the prescriptive way an institution should approach the development of their public-facing website.

Recruiting, Marketing, and Advertising Key Findings

In the competitive landscape of higher education, institutions will recruit, market, and advertise the benefits of attending the institutions across many media in an effort to attract high quality students. The VolEd Office does not wish to interfere with any of these processes or impede commerce. However, the VolEd Office does want to ensure Service members are fully informed in making their decisions, and are not presented with misleading or deceptive information that may lead to an inefficient use of Federal funds. The data examined in the area of Recruiting, Marketing, & Advertising were focused on the content used to attract prospective Service members as students, and whether this content complied with the legal and ethical requirements in the MOU.

Common Compliance-Related Findings

A significant number of non-compliant findings in Recruiting, Marketing, and Advertising centered on institutions making improper use of official DoD logos and insignias, as well as failing to provide clear information regarding the process required for Service members to receive TA funding. The use of official DoD logos and/or insignia, especially when presented in the form of a testimonial from an active duty Service member in uniform, connotes an endorsement from the DoD, and is prohibited. Also, incomplete or misleading information on the TA funding processes can cause confusion for an uninformed Service member, and potentially lead to an inefficient use of Federal funds.

Best Practices

The ICP team observed many instances of compliant Recruiting, Marketing, and Advertising activity during its evaluation. In many cases, institutions used current active duty Service members in cameo and video testimonials, but did so with the Service members **not** in uniform. Furthermore, these testimonials did not identify the individual's specific Military Service, nor were any references made to military rank. This conveyed the message that the individuals believed that their institution provided them with beneficial educational opportunities, but there was no implication of an official endorsement by the DoD.

The ICP team also found many instances where an institution posted information on the process to secure TA funding in a clear and straight forward manner, and directed Service members to utilize their Service-specific on-line resources, including their Educational Services Officers (ESOs), in order to get authoritative advice and counsel before progressing further into the process.

Figure 1 below shows a generic, fictitious representation of how an educational institution could properly display information for military students, including student testimonials.

The screenshot displays the VolEd University website. At the top, a red navigation bar contains the text 'ABOUT ACADEMICS ADMISSIONS STUDENT LIFE'. Below this, a dark blue banner reads 'Resource for Veterans & Military Students'. On the left, a dark blue sidebar lists navigation options: Admissions, Financial Aid, Tuition & Fees, Military TA Program, Counseling, Military Portals, Events, and Q & A. The main content area features a testimonial video titled 'VolEd University Student Testimonial' with a video player interface. To the right, a red box provides 'Location' (Hesburgh Hall, A113) and 'Hours' (Monday-Friday: 8am - 5pm). Below this, a 'QUICK LINKS' section includes logos for Federal Student Aid, FAFSA, and the U.S. Department of Education.

Figure 1 – Best Practices for Recruiting, Marketing, and Advertising

Financial Matters Key Findings

Financial Matters data pertain to the cost of attendance, pre- and post-enrollment tools and processes, and the ease with which prospective Service members can access information. MOU compliance requires that Service members have easy access to clear and accurate information regarding financial aid options. This includes access to trained and qualified counseling staff who can provide accurate and up-to-date information regarding the costs of attending an institution, and recommendations regarding individual financial choices.

Common Compliance-Related Findings

The ICP team found a significant number of non-compliant findings in Financial Matters that centered on institutions lacking transparency in explaining the various timelines necessary to secure TA funding and other federal financial aid, the actual total cost of attendance at the institution, and the differentiation between tuition and fees (current DoD policy does not allow TA support to cover books or fees). Additionally, institutions frequently did not provide sufficient evidence in their self-assessments to show that they are able to provide Service members with access to a trained, qualified financial aid advisor prior to enrollment. If a Service member is exploring his or her options, and does not have the information to make “apples-to-apples” comparisons across institutions and programs, nor access to individuals who are trained and qualified to provide that information, there is a risk that the Service member will make decisions that are not in his or her best interests.

In a small but significant number of cases, institutions required Service members to provide personal contact information prior to making financial information available. The ICP team also found that some institutions were making unsupportable claims about loan pre-approvals,

automatic enrollments, and “fast tracks” to diplomas. These all directly violate DoD policies regulations, and, in some cases, also violate ED policies.

Best Practices

The ICP team observed several instances where institutions made clear and straightforward financial information available to Service members. They clearly delineated their institutional fee structure and provided information on the total cost of attendance to complete their programs. Furthermore, when asked to provide evidence of qualified, trained financial advisors, some institutions provided examples of the training programs they use to ensure they have properly qualified personnel in those positions.

The Figures below show clear examples of how an educational institution like the fictitious VoEd University could display its tuition information (Figure 2), as well as the steps necessary to apply for financial aid with the institution (Figure 3).

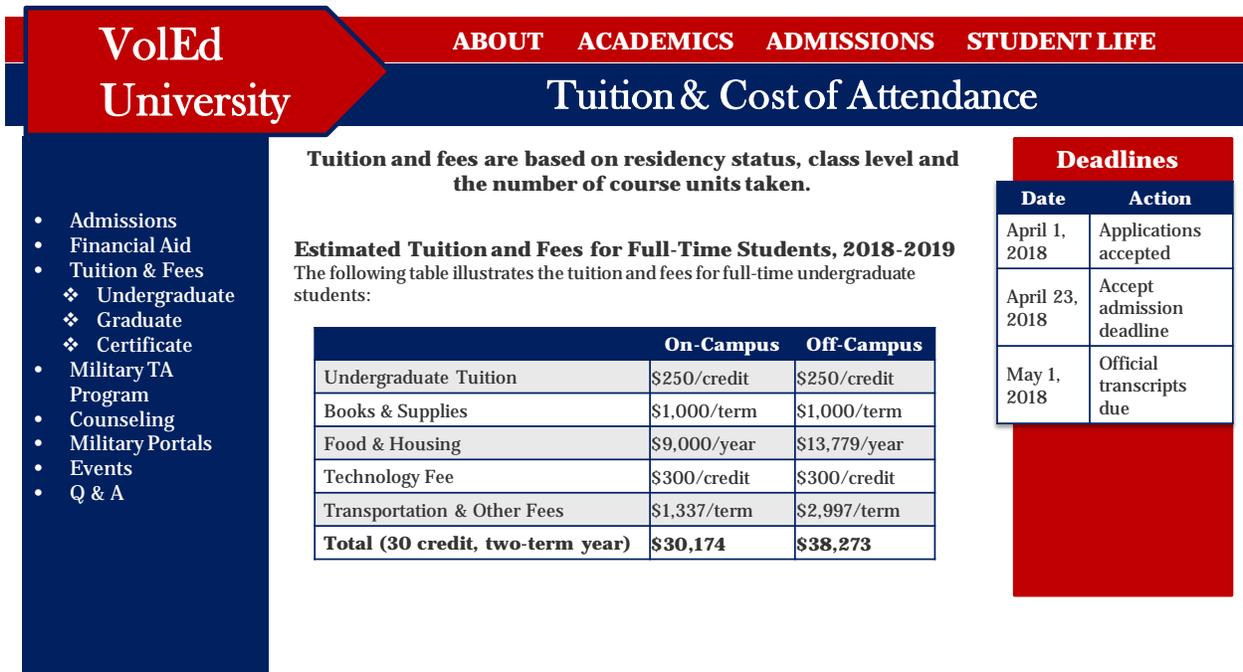


Figure 2 – Best Practice for Displaying Tuition and Cost

VoEd University

ABOUT ACADEMICS ADMISSIONS STUDENT LIFE

Financial Aid

- Admissions
- Financial Aid
 - ❖ Getting Started
 - ❖ Types of Aid
 - ❖ Receiving Aid
 - ❖ Scholarships
- Tuition & Fees
- Military TA Program
- Counseling
- Military Portals
- Events
- Q & A

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	
Date	Action
February 15	FAFSA application due
March 1	Complete IDOC
March 15	Financial aid notifications sent
June 1	Scholarship application deadline

QUICK LINKS

Federal Student Aid
AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

FAFSA®
Free Application for Federal Student Aid

U.S. Department of Education

Figure 3 – Best Practice for Steps to Apply for Financial Aid

Accreditation Key Findings

To be able to sign a DoD MOU, all institutions must be accredited by a national or regional accrediting body recognized by the ED. Also, the institution may only conduct programs from among those offered or authorized by the main administrative and academic office, in accordance with standard procedures for authorization of degree programs by the educational institution. However, a school may have institutional accreditation, but offer degree programs that have *not* been accredited by a recognized body, such as the National Architecture Accrediting Board, or the Forensic Science Education Programs Accreditation Commission. Individuals who complete degree programs that do not have this programmatic accreditation would receive a valid degree, but may not be able to immediately pursue employment in that field without additional coursework or testing. This could be critical information for a prospective student to have during their decision-making process, so therefore institutions must keep this information up-to-date and easily accessible.

Common Compliance-Related Findings

The ICP team found several instances in Accreditation where an institution displayed programmatic accreditation information, but the accrediting agency specified was no longer recognized by the ED, making the information provided misleading. There were also many cases where the institution’s website contained no accreditation information at all, and the institution did not provide the information when requested in the self-assessment. Absent this information, or if it is provided but incorrect, a prospective TA student could make an ill-informed decision, and spend years and thousands of dollars in personal and Federal funds to earn a degree that does not prepare the student to enter the workforce in their chosen field.

Best Practices

The ICP team observed a large number of institution webpages that very clearly listed their accredited programs of study. Some even included links to the authoritative body that provided the accreditation and an accompanying hyperlink to the accreditation letter itself. With this information, a prospective student could make an informed decision.

Figure 4 shows how educational institutions could effectively and properly display their programmatic accreditation information.



Figure 4 – Best Practices for Displaying Accreditation Information

Post-Graduate Opportunities Key Findings

Along with programmatic accreditation, a Service member will likely want to take post-graduation opportunities into account when making education decisions. To support this part of the decision calculus, institutions should provide readily available information for prospective and current Service members to aid in the post-academic transition. This information should include the unchanging degree plans and requirements needed, guidance available for professional opportunities upon completion of the degree program, and processes regarding readmission policies for Service members fulfilling military obligations while attending the institution.

Common Compliance-Related Findings

The ICP team found many instances in Post-Graduate Opportunities where institutions were not fully compliant with the MOU tenets. In many cases, when asked to “Provide evidence that the institution provides a point of contact (POC) knowledgeable of the military Tuition Assistance (TA) program, ED Title IV funding, VA education benefits, and familiar with institutional

services to Service members who are seeking information about academic counseling, financial aid counseling, job search support, or other student support services at the educational institution,” the response directed the compliance analyst to a webpage that would not load properly. In other cases, the institution simply provided an employee’s name or a hyperlink to a page with employees’ names, but neither provided any evidence of their qualifications or training.

Best Practices

The ICP team observed many cases of thorough descriptions of individuals’ duties and responsibilities that meet the requirement for trained, knowledgeable counselors. In some cases, institutions provided an internal position description which detailed the required knowledge, skills, and abilities for the individual who occupies that position.

Conclusion

The first three annual cycles of the ICP proved to be an informative and worthwhile endeavor. The ICP team leveraged voluminous data and found nearly 6,000 compliance-related findings across over 700 institutions of higher learning. The team then provided specific compliance improvement feedback to each of those institutions using individualized reports, enabling them to initiate corrective actions and improve their compliance. The team also provided briefings in an open forum of MOU signatories in an effort to share the lessons learned and promote the culture of compliance across the enterprise. This document should serve to further these communications efforts and make this information available to all MOU signatories. All of these evaluation and communication efforts are part of a holistic effort to improve the overall compliance level across the VolEd enterprise, while providing educational opportunities and protections for Service members.