

UNITED STATES DEPARTMENT OF DEFENSE



# Department of Defense Voluntary Education Program

DoD Installation Access  
Awareness Brief

July 2015



# Agenda

- **Purpose**
- **Background**
- **DoDI 1322.25**
- **DoD Installation Access**
- **Granting Access**
- **Monitoring Access**
- **Reporting Non-Compliance**
- **Common Practices**
- **Frequently Asked Questions**



# Purpose

- **Encourage Service-wide promotion, understanding and support for appropriate educational institution access to DoD installations.**
- **Educate military education professionals (including education center personnel) and Command elements on the new provisions of Department of Defense Instruction (DoDI) 1322.25 concerning educational institution access to DoD installations.**
- **Equip military education professionals (including education center personnel) with tools to assist in implementing uniform rules and/or procedures for access to DoD installations.**



# Background

(Principles of Excellence)

- **On April 27, 2012, President Obama signed Executive Order (EO) 13607 directing agencies to implement and promote compliance with “Principles of Excellence” for educational institutions that interact with Veterans, Service members and their families.**
- **EO 13607 seeks to address questionable targeting activities, while ensuring students are better equipped with comprehensive information to make school and program choices that meet their educational goals.**
- **EO 13607 also directed DoD to establish new uniform rules and strengthen existing procedures for access to military installations by education institutions.**



# Background

(Change 3, DoDI 1322.25)

- ➔ **DoD Instruction (DoDI) 1322.25, “Voluntary Education Programs,”:**
  - Establishes Voluntary Education policy.
  - States eligibility criteria for tuition assistance (TA).
  - Requires signed memorandum of understanding (MOU) with DoD to provide educational programs and receive TA.
  - Incorporates remaining Principles of Excellence in support of EO 13607 (April 27, 2012).
  
- ➔ **Final rule posted to Federal Register May 15, 2014.**
  
- ➔ **Change 2, DoDI 1322.25, posted to DoD Issuances May 23, 2014.**
  
- ➔ **Change 3, DoDI 1322.25, posted to DoD Issuances July 7, 2014.**
  
- ➔ **Requirements surrounding educational institution access to DoD installations changed significantly.**



# DoDI 1322.25

(New Provisions of Change 3)

- **All educational institutions providing education programs through the DoD Tuition Assistance (TA) program:**
  - Will provide meaningful information to students about the financial cost and attendance at an institution so military students can make informed decisions on where to attend school.
  - Will not use unfair, deceptive, and abusive recruiting practices.
  - Will provide academic and student support services to service members and their families.
- **Implementation of rules to strengthen existing procedures for access to DoD installations by educational institutions.**
- **Implementation of the DoD Postsecondary Education Complaint System for service members, spouses, and adult family members to register student complaints.**



# DoDI 1322.25

(New Definitions of Change 3)

- A ***DoD installation*** is any active duty military, Reserve or National Guard owned, leased, or operated base, reservation, post, site, camp, building, or other facility to which DoD personnel are assigned for duty. This includes but is not limited to locations at an active duty military installation, Reserve and National Guard facility (state readiness center, armory, unit, etc.), or recruiting center (leased space inside a shopping mall or office building).
- An educational institution ***agent*** is a lawful agent of the educational institution and is limited to persons who have written authorization to act on behalf of the educational institutions.
- An ***education advisor*** is a professionally qualified, subject matter expert or program manager in the Education Services Series 1740 or possessing equivalent qualifications at the education center. Commonly used position titles include Education Services Specialist (ESS), Education Services Officer (ESO), Voluntary Education Director, Navy College Office Director, and Education and Training Section (ETS) Chief.



# DoD Installation Access

(Basic Requirements)

- **Educational institutions may be allowed access to installations to provide on-installation education programs, services, and education guidance to their students and/or to participate in sanctioned education fairs if they meet all of these criteria:**
  - **Have a signed Voluntary Education Partnership MOU with DoD.**
  - **Are in compliance with state requirements and laws.**
  - **Are state-approved for the use of veterans' education benefits (Post 9/11 GI Bill).**
  - **Are certified to participate in federal student aid programs through the Department of Education**
  - **Are accredited by a national or regional accrediting body recognized by the Department of Education and conduct programs that support degree programs from that institution.**

# DoD Installation Access

(Restrictions)



- ➡ Only educational institutions with a signed Voluntary Education Partnership MOU with DoD may be granted access to the DoD installation.
- ➡ All requests for DoD installation access by an educational institution are the responsibility of the education advisor (government official).
- ➡ Access to DoD installations is permitted only to provide education, guidance, training opportunities, and participate in sanctioned education fairs.
- ➡ Only contracted educational institutions are permitted on overseas DoD installations.
- ➡ Access provisions apply to the educational institution itself and its agents including third party lead generators, marketing firms, or companies that own or operate the educational institution.
- ➡ Educational institutions or their agents that gain access for the performance of contracted services are permitted only in accordance with the requirements of the contract and/or agreement.

# DoD Installation Access

(Additional Requirements)



- ➡ The responsible education advisor will ensure that educational institutions gaining access to the DoD installation solely to provide academic counseling or support services to students:
  - Only advise or counsel students at the education center or a location approved by the responsible education advisor.
  - Maintain a record of students counseled and provide a copy to the education office upon departure from the visit.
  - Adhere to applicable federal laws, DoDI 1344.07 (Personal Commercial Solicitation on DoD Installations), DoDI 1322.19 (Voluntary Education Programs in Overseas Areas), and the cognizant Military Service's policies and regulations.
  - Comply with applicable DoD installation policies and procedures designated by the installation commander such as the below.

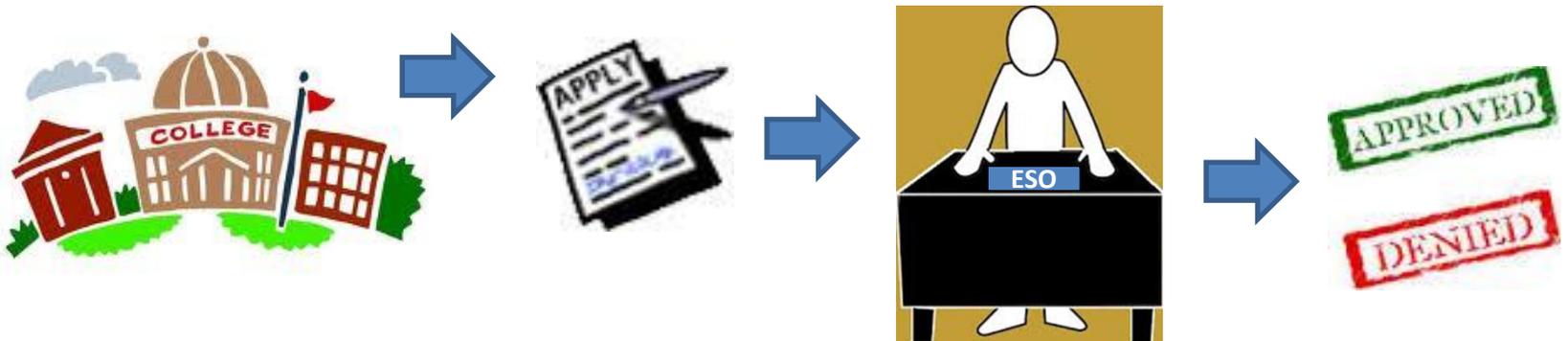
fire and safety	environment	physical security
personnel background checks	vehicle inspection and registration	any other applicable statutes or regulations designated by installation commander



# Granting Access

(Access Requests)

- Educational institutions interested in providing education, guidance, training opportunities, and participating in sanctioned education fairs on a DoD installation provide their requests to the responsible education advisor, who will review and analyze these requests on behalf of the installation commander.
- Educational institutions desiring access to provide on-installation education programs must follow applicable DoD installation policies and procedures to include signing an MOU with the installation in addition to the MOU signed with DoD.





# Granting Access

(General Provisions)

## ➡ The responsible education advisor will:

- Ensure all educational institutions granted access to DoD installations have a signed Voluntary Education Partnership MOU with DoD and are in compliance with state requirements and laws.
- Fully consider requests received from educational institutions complying with DoDI 1322.25 requirements and be consistent in treatment of educational institutions.
- Comply with applicable ethics guidelines (obligation to report violations, acceptance of gifts/favors, appearances of conflicts, etc.).
- Provide timely responses (to include reason(s) for denial) to educational institutions when requests are denied.
- Maintain copies of all correspondence regarding DoD installation access requests for a minimum of 2 years.
- Ensure the access granted is in compliance with DoDI 1322.25 requirements (e.g. communicate needs to wide variety of potential providers, derive requirements from periodic needs assessment, and follow applicable DoD installation policies and procedures).



# Granting Access

(Personal Commercial Solicitation)

- ▶ **Any contact by an educational institution with a Service member for the purpose of asking or encouraging the member to sign up for one of the educational institution's programs (assuming the program has some cost) is considered personal commercial solicitation.**
- ▶ **The responsible education advisor will ensure educational institutions comply with DoD Instruction 1344.07, "Personal Commercial Solicitation on DoD Installations" and all requirements established by the installation commander for solicitation.**



# Granting Access

(Meaningful Information)

- **Materials available through the education center that provide basic information about the educational institution or its programs or services in compliance with this MOU, will *not* be considered personal commercial solicitation. This includes, but is not limited to, brochures, flyers, and catalogs provided by the educational institution.**
- **The responsible education advisor will ensure adequate and appropriate materials are available at no cost to the Service member and at no additional charge to the educational institution meeting the requirements as stated in DoDI 1322.25 and in compliance with the DoD Voluntary Education Partnership MOU.**



# Granting Access

(Commercial Sponsorship/Advertising)

- ▶ **Commercial Sponsorship/Advertising agreements may be permissible when vetted through the responsible education advisor; access requirements are outlined in DoDI 1322.25.**
- ▶ **Agreements should not conflict with the DoD Voluntary Education Partnership MOU and governing regulations.**
- ▶ **Specific areas of concern include, but are not limited to, activities that may be considered personal commercial solicitation, misrepresentation, or recruitment by their nature (i.e., setting up a table and handing out sales literature, donations in exchange for physical presence, advertising ineligible programs, handing out items having more than a *de minimis* value, and obtaining contact information of event participants).**



# Monitoring Access

(Basic Requirements)

- ➡ **The responsible education advisor will monitor educational institutions and its agents granted access to DoD installations to ensure they do not:**
  - **Use unfair, deceptive, abusive or fraudulent devices, schemes, or artifices, including misleading advertising or sales literature.**
  - **Engage in unfair, deceptive, or abusive marketing tactics, such as during unit briefings or assemblies; engaging in open recruiting efforts; or distributing marketing materials on the DoD installation at unapproved locations or events.**
  - **Market to or recruits newly assigned military personnel to the DoD installation, unless the Service member has received information about voluntary education programs and services available at that DoD installation, to include TA, from their education services staff or as part of their orientation to the new DoD installation.**
  - **Provide programs/services not in accordance with the requirements of the contract and/or agreement.**



# Monitoring Access

(Additional Requirements)

- Educational institutions requesting access ***solely*** to provide academic counseling or support services to students are ***not required*** to sign a ***separate*** MOU with the installation, but must:
  - Have a minimum of 20 military-connected students (eligible TA, Title IV and GI Bill recipients) enrolled to gain access onto the installation.
  - Adhere to certain reporting requirements following the visit on the installation (record of students counseled).
  - Comply with applicable federal laws, DoDI 1344.07 (Personal Commercial Solicitation on DoD Installations), DoDI 1322.19 (Voluntary Education Programs in Overseas Areas), and the cognizant Military Service's policies and regulations.
  - Follow applicable DoD installation policies and procedures designated by the installation commander to include signing an MOU with the installation, if required, in addition to the MOU signed with DoD.



# Monitoring Access

(Regular Review)

- **Current agreements (installation MOUs, solicitation agreements, contracts, etc.) and existing access policies and procedures (military service, DoD installation, etc.) may require regular review and corrective action to promote compliance with the DoD installation access provisions of DoDI 1322.25.**
- **Responsible education advisors should take steps to:**
  - **Regularly review local MOUs, contracts, solicitation, policies and procedures (military service, DoD installation, etc.) for compliance with DoDI 1322.25, taking action (as needed) to cancel and/or amend agreements not in compliance.**
  - **Reform/implement standard processes and procedures for requesting and monitoring access, taking action (as needed) to halt current processes and procedures not in compliance.**



# Reporting Non-Compliance

(What To Report)

- **Military education professionals (including education center personnel) should report to [osd.pentagon.ousd-p-r.mbx.vol-edu-compliance@mail.mil](mailto:osd.pentagon.ousd-p-r.mbx.vol-edu-compliance@mail.mil), and applicable Service officials, any educational institution or its agent that:**
  - Uses unfair, deceptive, abusive or fraudulent devices, schemes, or artifices.
  - Engages in unfair, deceptive, or abusive marketing tactics.
  - Markets to or recruits newly assigned military personnel to the DoD installation.
  - Provides programs/services not in accordance with the requirements of the contract and/or agreement.
- **Government officials are subject to applicable ethics regulations (obligation to report violations, acceptance of gifts/favors, appearances of conflicts, etc.).**
- **Examples of specific areas to report and reportable activities follow.**



# Reporting Non-Compliance

## (General Access)

### Reportable institution activities might include:

School does not have a signed Voluntary Education Partnership MOU with DoD.

School is not in compliance with State requirements and laws.

School did not request access through the responsible education advisor.

School contacts individuals in non-approved locations (e.g., duty section, or formation).

Non-contracted school on an overseas DoD installation.

School participated in an education event not sponsored by an organization governed by DoDI 1322.25 and/or not requested/approved through the responsible education advisor (e.g., education events sponsored by Yellow Ribbon, recruiting, transition, or education events held off-installation at a hotel and/or leased facility).

School had an unauthorized agent (does not have written authorization to act on behalf of the educational institution) on DoD installation.

School on the DoD installation after denial of access.

School does not provide the education office a record of students counseled upon departure from the visit.

School does not comply with applicable DoD installation policies and procedures designated by installation commander (fire and safety, personnel background checks, vehicle registration, etc.).



# Reporting Non-Compliance

(Misleading Advertising/Sales Literature)

## Reportable institution activities might include:

Materials make claims that credits earned are easily transferable to other schools or programs.

Materials claim or suggest the school or program is endorsed by or affiliated with the military.

Materials state that federal money, including military tuition assistance funds, will cover the entire cost of the program.

## Materials use statistics that seem unlikely such as:

- Job placement rates seem high or over-the-top (making claims such as “Our graduates are recruited by all the Fortune 500 firms”).
- Publicized high graduation or completion rates (making claims such as, “99% of Service members graduate”).
- Graduation rates for military students seem very low and/or different than the rate identified in public materials.
- Claims about student repayment seem high.
- Claims about the length of time it takes to complete the program and graduation seem unrealistic.



# Reporting Non-Compliance

## (Recruiting Practices)

### Reportable institution activities might include:

School engages in aggressive and/or deceptive recruiting practices.

School recruits military students with serious brain injuries and emotional vulnerabilities without providing academic support and counseling.

School encourages military students to take out costly commercial or institutional loans rather than encouraging them to apply for Federal student loans first.

School uses unfair recruiting practices (misrepresentation, contacting prospective students in non-approved location - e.g., duty section, formation) on DoD installation.

School uses high-pressure recruitment tactics such as engaging in same-day recruitment and registration or offering payment of incentive compensation for the purpose of securing enrollments.

School does not provide a personalized form covering the total cost of an educational program, pre-enrollment program costs, student debt estimates, and financial aid options in advance of enrollment and/or registration.

School fails to provide prospective military students with specific information to locate, explain, and properly use identified ED and CFPB tools (The College Scorecard, The College Navigator, The Financial Aid Shopping Sheet, and The 'Paying for College' webpage).

School enrolls students in new courses/program prior to the course/program receiving the approval of the educational institution's accrediting agency

School does not provide access to an institutional financial aid advisor for appropriate loan counseling.



# Reporting Non-Compliance

(Access Approval/Monitoring)

## Reportable education advisor activities might include:

Access granted to educational institution not in compliance with DoDI 1322.25.

Inconsistent treatment of educational institutions requesting access.

On-installation programs or college offerings secured without a periodic needs assessment.

Regular or recurring office hours granted for an educational institution solely to provide counseling.

Failure to monitor educational institutions and their agents granted access to the DoD installation.

Access denial not in compliance with DoDI 1322.25.

Access granted to education institution in the performance of contracted services not in accordance with the requirements of their contract and/or agreement.



# Reporting Non-Compliance

(Compliance Action)

- ▶ **DoD will work with educational institutions to resolve any reports of non-compliance submitted by a military education professional (including education center personnel) to [osd.pentagon.ousd-pr.mbx.vol-edu-compliance@mail.mil](mailto:osd.pentagon.ousd-pr.mbx.vol-edu-compliance@mail.mil) and applicable Service officials.**
- ▶ **Educational institutions having recurring, substantive reports of non-compliance or demonstrating an unwillingness to resolve reports of non-compliance may face a range of penalties from a directed Third Party Education Assessment to revocation of the DoD Voluntary Education Partnership MOU and removal from participation in the DoD TA Program.**
- ▶ **As appropriate, DoD will refer non-compliance reports to other government agencies/regulators including but not limited to the Federal Trade Commission (FTC), Department of Justice (DOJ), Consumer Financial Protection Bureau (CFPB), Department of Veterans Affairs (VA), and Department of Education (ED).**



# Common Practices

(Recommended)

- Designate an education advisor to grant and monitor access.
- Grant access to educational institutions at least twice annually to provide academic counseling or support services to students.
  - Aligned with peak enrollment periods.
  - Commensurate with guidance needs of student population.
- Sponsor an education fair at least once annually commensurate with the postsecondary education needs of population served.
- Execute consistent access policies and procedures based on documented criteria and/or requirements.
- Employ a standardized access request form to document the request, notate approval or denial, track monitoring and reporting requirements, and maintain records management.
- Conduct a periodic needs assessment at least tri-annually.
- Annually review installation-level MOUs for compliance.
- Promptly report non-compliance activities to [osd.pentagon.ousd-p-r.mbx.vol-edu-compliance@mail.mil](mailto:osd.pentagon.ousd-p-r.mbx.vol-edu-compliance@mail.mil) and applicable Service official.



# Common Practices

(Not Supported)

- Provide blanket denial of DoD installation access to all educational institutions.
- Follow separate access procedures for education-related activities sponsored by elements such as recruiting, transition, Yellow Ribbon Reintegration Program, MWR, AAFES, etc.
- Authorize regular or recurring office hours for an educational institution solely to provide counseling.
- Grant access based on first-come, first-served methodologies or favoritism/biases for certain educational institutions.
- Allow former military members to access the DoD installation representing an educational institution based on their government ID card privileges, bypassing established request procedures.
- Permit activities that facilitate select educational institutions recruiting and providing marketing materials outside of a sanctioned education fair such as tables set up at inappropriate locations (i.e., unit briefings/assemblies, commissary, food court).

# Frequently Asked Questions



- **What are the requirements for DoD installation access?**
  - DoD Instruction 1322.25, "Voluntary Education Programs," allows educational institutions access to installations to provide programs, services, and education guidance to their students or to participate in sanctioned education fairs. It also has a new section covering access for institutions that only want to provide academic counseling or support services to their students. These institutions must have a minimum of 20 military-connected students enrolled and must adhere to certain reporting requirements following the visit.
  
- **What is considered a DoD installation for this requirement? Is this limited to active duty military installations?**
  - A DoD installation is any active duty military, Reserve or National Guard, owned, leased, or operated base, reservation, post, site, camp, building, or other facility to which DoD personnel are assigned for duty. This includes, but is not limited to, locations at an active duty military installation, National Guard or Reserve facility (state readiness center, armory, unity, etc.), or recruiting center (leased space inside a shopping mall or office building).

# Frequently Asked Questions



- **Can my educational institution request DoD installation access? What are the requirements?**
  - Any educational institution can request installation access for permissible activities (to provide programs, services, and education guidance to their students or to participate in sanctioned education fairs). In order to obtain DoD installation access an educational institution must:
    - Submit a written request to the responsible education advisor who will analyze the request and make a determination on behalf of the installation commander.
    - Have a signed Voluntary Education Partnership MOU with DoD. Further, a signed Voluntary Education Partnership MOU with DoD is dependent on the educational institution being state-approved for the use of veterans' education benefits, certified to participate in federal student aid programs through the Department of Education (ED), and accredited by a national or regional accrediting body recognized by the ED.
    - Be in compliance with state requirements and laws.
  - In addition, educational institutions requesting access solely to provide academic counseling or support services to students must have a minimum number of 20 military-connected students enrolled at that installation and must adhere to certain reporting requirements following the visit. Further, educational institutions requesting access to provide on-installation education programs or services must follow applicable DoD installation policies and procedures. Access granted for the performance of contracted services is permitted only in accordance with the requirements of the contract and/or agreement.

# Frequently Asked Questions



- **How does an educational institution request DoD installation access?**
  - Educational institutions interested in providing education, guidance, training opportunities, and participating in sanctioned education fairs on a DoD installation must provide their written requests to the responsible education advisor, who will review and analyze these requests on behalf of the installation commander. Educational institutions desiring access to provide on-installation education programs must follow applicable DoD installation policies and procedures to include signing an MOU with the installation in addition to the MOU signed with DoD.
  
- **Does my institution need to sign a separate MOU with each DoD installation we request access to?**
  - No. The DoD Voluntary Education Partnership MOU serves as the uniform MOU with DoD outlining the requirements for DoD installation access. For example, signing a separate MOU with the installation is not a requirement for educational institutions solely providing academic counseling or support services to students or participating at sanctioned education fairs at approved locations. However, each DoD installation may require installation-specific requests and reporting procedures for this type of access. Educational institutions that provide on-installation education programs or services such as classroom instruction, however, must sign an MOU with that installation in addition to meeting the DoD installation access provisions of DoDI 1322.25, Voluntary Education Programs. The installation-specific MOU stipulates the additional provisions for which an educational institution is permitted access to the DoD installation in performance of contracted services.

# Frequently Asked Questions



- **Can a third party provider access the DoD installation on behalf of an educational institution?**
  - Yes. DoD installation access is limited to educational institutions or their agents meeting the requirements as stated in DoDI 1322.25, Voluntary Education Programs. Further, agents representing education institutions in the performance of contracted services are permitted DoD installation access only in accordance with the requirements of their contract and/or agreement.
  
- **Who is responsible for granting and monitoring DoD installation access?**
  - All requests for DoD installation access by an educational institution are referred to the responsible education advisor (government official). The education advisor, on behalf of the installation commander, is responsible for ensuring all educational institutions and its agents granted access to DoD installations to provide education, guidance, training opportunities, and participate in sanctioned education fairs to Service members adhere to referenced laws and instructions, applicable DoD installation policies and procedures. In accordance with DoDI 1322.25, "Voluntary Education Programs," an education advisor is a professionally qualified, subject matter expert or program manager in the Education Services Series 1740 or possessing equivalent qualifications at the education center. This responsibility is inherently governmental to be performed by a government official. Commonly used position titles include, but are not limited to, Education Services Specialist (ESS), Education Services Officer (ESO), Voluntary Education Director, Navy College Office Director, and Education and Training Section (ETS) Chief.

# Frequently Asked Questions



## ➔ What are the responsibilities for granting DoD installation access?

- Responsible education advisors will ensure educational institutions granted access to DoD installations have a signed MOU in good standing with DoD and are in compliance with state requirements and laws. They will fully consider each request received for appropriate and adequate access providing a timely response to all properly submitted requests. DoD installation access is not guaranteed and requires careful consideration of the following:
  - Purpose of Visit. Types of permissible activities include the delivery of education/training programs or services through an installation-specific Memorandum of Understanding (only type of visit that supports regular/recurring format); the provision of academic counseling or support services; and recruitment, marketing, and advertising visits (i.e., education fairs, job training, career/transition events, or sponsorship).
  - Capability to Host. Factors may include, but are not limited to, the consistent treatment of educational institutions, value to the Service member and mission tempo of the servicing DoD Installation and/or education office.
  - Status of DoD Voluntary Education Partnership MOU. Educational institutions having an MOU not in good standing with DoD (i.e., Probationary or Title IV Non-Compliant Status) are limited to DoD installation access that supports current students for “teach-out” activities.
- The responsible education advisor will ensure access granted to provide on-installation education programs or services complies with DoDI 1322.25, "Voluntary Education Programs," requirements (e.g., communicate needs to wide variety of potential providers, derive requirements from periodic needs assessment, and follow applicable DoD installation policies and procedures). If a request is denied, the responsible education advisor will provide the reason(s) for denial in writing. Copies of all correspondence pertaining to DoD installation access requests and determinations will be maintained for a minimum of two years.

# Frequently Asked Questions



- **What are the responsibilities for monitoring DoD installation access?**
  - Responsible education advisors will monitor educational institutions and its agents granted access to DoD installations ensuring the compliance with the provisions of DoDI 1322.25, "Voluntary Education Programs," during the visit. Further, they will ensure educational institutions do not:
    - Use unfair, deceptive, abusive or fraudulent devices, schemes, or artifices, including misleading advertising or sales literature.
    - Engage in unfair, deceptive, or abusive marketing tactics such as participating in unit briefings or assemblies, engaging in open recruiting efforts, or distributing marketing materials on the DoD installation at unapproved locations or events.
    - Market to or recruit newly assigned military personnel to the DoD installation, unless the Service member has received information about voluntary education programs and educational services available at that DoD installation, to include TA, from their education services staff or as part of their orientation to the new DoD installation.
    - Provide programs/services not in accordance with the requirements of the contract and/or agreement.
  - The responsible education advisory will obtain a record of students counseled (academic counseling or support services only) provided upon departure of the institutional representative.

# Frequently Asked Questions



- **Is advertising and marketing considered DoD installation access?**
  - Any contact by an educational institution with a Service member for the purpose of asking or encouraging the member to sign up for one of the educational institution's programs (assuming the program has some cost) is considered personal commercial solicitations. The responsible education advisor will ensure educational institutions comply with DoD Instruction 1344.07, Personal Commercial Solicitation, on DoD Installations and all requirements established by the installation commander for solicitation. Personal commercial solicitation includes but is not limited to advertising (billboards, signs, newspaper/base publication ads, tables set up in common areas, etc.) and commercial sponsorship (providing assistance, funding, goods, equipment, or services to an MWR program or event).
  
- **Are brochures, flyers, and catalogs provided through the education center considered personal commercial solicitation?**
  - Materials available through the education center that provide basic information about the educational institution or its programs or services, in compliance with the MOU, will not be considered personal commercial solicitation including, but not limited to, brochures, flyers, and catalogs provided by the educational institution. The responsible education advisor will ensure adequate and appropriate materials are available at no cost to the Service member and at no additional charge to the educational institution meeting the requirements as stated in the policy section of this part and in compliance with the DoD.

# Frequently Asked Questions



- **What are the requirements for an educational institution granted access solely to provide guidance to their students?**
  - If an DoD installation grants access to an educational institution to provide guidance to their students, the educational institution and its agents will:
    - Only advise or counsel students at the education center or at a location approved by the responsible education advisor.
    - Maintain a record of students counseled and provide a copy to the education office upon departure from the visit. The record will annotate the type of program and the status of the Service member (current or reenrollment).
    - Comply with applicable DoD installation policies and procedures designated by the installation commander on such matters as fire and safety, environment, physical security, personnel background checks, vehicle inspection and registration, and any other applicable statutes or regulations designated by the installation commander.
    - Refer any walk-up potential recruits to the education center for initial education counseling.
  
- **Does commercial sponsorship/advertising require a DoD installation access?**
  - Yes. Participation in DoD installation activities, including commercial sponsorship/advertising agreements, require an educational institution to request DoD installation access. Such activities may be permissible when vetted through the responsible education advisor to ensure:
    - Agreements do not conflict with the DoD Voluntary Education Partnership MOU.
    - Educational institutions entering into such agreements are not automatically granted DoD installation access. The educational institution must submit a request to the responsible education advisor should the educational institution desire access to the DoD installation in relation to the agreement (e.g., sponsorship).

# Frequently Asked Questions



- **Should non-compliance with DoD installation access requirements be reported?**
  - Yes. Military education professionals (including education center personnel) should promptly report non-compliance with the provisions of DoDI 1322.25, "Voluntary Education Programs," directly to [osd.pentagon.ousd-p-r.mbx.vol-edu-compliance@mail.mil](mailto:osd.pentagon.ousd-p-r.mbx.vol-edu-compliance@mail.mil) and applicable Service officials. Government officials are subject to applicable ethics regulations as recognized by the U.S. Office of Government Ethics.
  
- **What kind of DoD installation access non-compliance activities should military education professionals report?**
  - Military education professionals (including education center personnel) should report any educational institution or its agent that:
    - Uses unfair, deceptive, abusive or fraudulent devices, schemes, or artifices, including misleading advertising or sales literature.
    - Engages in unfair, deceptive, or abusive marketing tactics such as participating in unit briefings or assemblies, engaging in open recruiting efforts, or distributing marketing materials on the DoD installation at unapproved locations or events.
    - Markets to or recruits newly assigned military personnel to the DoD installation, unless the Service member has received information about voluntary education programs and educational services available at that DoD installation, to include Tuition Assistance, from their education services staff or as part of their orientation to the new DoD installation.
    - Provides programs/services not in accordance with the requirements of the contract and/or agreement.