Agenda

• Introductions
• Institutional Compliance Program (ICP) Overview
• 2018 ICP Review
• Discussion of Findings & Notional Examples
  – Programmatic Accreditation
  – Post-Graduation Opportunities
  – Financial Matters
  – Recruiting, Marketing, & Advertising
  – Imagery Guidelines
• Way Ahead
Introductions

• Anthony Clarke serves as an Education Program Analyst for Defense Voluntary Education (VolEd), where he is responsible for the coordination and review of compliance issues for the Department of Defense Memorandum of Understanding.

• Scott Flood is a Manager with Guidehouse, LLP* (formerly the PricewaterhouseCoopers’ Public Sector Practice), and serves as the Project Manager for the DoD VolEd ICP project.

*Guidehouse, LLP, is contracted to provide services to the DoD VolEd program.
Institutional Compliance Program (ICP) Overview
DoD Voluntary Education Strategic Plan
(2015-2020)

**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 voluntary educational opportunities, empower informed service member decision-making, shape meaningful personal and professional pathways, and drive military-student success in higher voluntary 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
ICP Approach

MOU

1. PREAMBLE
   a. Providing access to quality postsecondary education opportunities is a strategic investment that enhances the U.S. Service member’s ability to support mission accomplishment and successfully return to civilian life. A forward-looking, lifelong learning environment is fundamental to the maintenance of a ready, powerful and adaptive force. Today’s fast-paced and highly mobile environment, where frequent deployments and mobilizations are required to support the Nation’s policies and objectives, require the DoD to sponsor postsecondary educational programs using a variety of learnership models that include online and off-installation as well as distance learning (DL). All are designed to support the professional and personal development and progress of Service members and the DoD civilian workforce.

   b. Making these postsecondary programs available to the military community as a whole further provides service members, their eligible, adult family members, DoD civilian employees, and military retirees ways to advance their personal education and career aspirations and of DoD. This helps strengthen the Nation by producing a well-educated citizenry and ensures efforts in an all-volunteer force.

2. PURPOSE
   a. This MOU articulates the commitment and agreement educational institutions provide to the Department of Defense by accepting funds via each Service’s tuition assistance (TA) program in exchange for education services.
ICP Feedback Process

Enhanced communications lead to an improved *Culture of Compliance*
ICP Review Discussion

- Program approaching steady state, but applying continuous process improvements to enhance effectiveness
- Second annual cycle reinforced findings from first year
- Some common findings of non-compliance across the sample population...highlighting the need for improved communications
- Numerous opportunities to apply lessons learned

Overarching Goal: Provide Service members with opportunities and safeguards
2018 ICP Review
2018 Selection Results

All DoD MOU Institutions
- Public: 61%
- Private, For-Profit: 10%
- Private, Non-Profit: 29%

250 ICP Institutions
- Public: 65%
- Private, For-Profit: 8%
- Private, Non-Profit: 27%

250 ICP Institutions chosen via the risk factor evaluation and random selection closely match overall demographics.
2018 Areas Examined

- **Recruiting, Marketing, & Advertising**
  - Are Educational Institutions complying with the moral, legal, and ethical guidelines established in the MOU?

- **Financial Matters**
  - Are Service members provided access to qualified and trained staff at Educational Institutions to answer financial questions and 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 assessment evaluations utilized over 24,000 pieces of data
ICP Summary

Non-Compliant Findings

Out of 49 data elements, 28 Institutions had 9 Non-Compliant Findings.
2018 Summary

Non-Compliant Findings by ICP Category

ICP 2017    ICP 2018

- Recruiting, Marketing & Advertising
- Financial Matters
- Accreditation
- Post-Graduate Opportunities

% of Non-Compliant Findings
Discussion of Findings & Notional Examples
Programmatic Accreditation

• Most Common Area of Concern:
  – Lack of demonstrated 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 and/or testing
Common Non-Compliance

- Provide evidence that the institution discloses any conditions or additional requirements required to obtain credentials.
  - Many instances where the institution did not provide any answer
  - Several other cases where the institution provided a degree plan, a citation from the course catalog, or detailed information on the transfer of credits
Professional Accreditation

In the United States, most registration boards require a degree from an accredited professional degree program as a prerequisite for licensure. The National Architectural Accrediting Board (NAAB), which is the sole agency authorized to accredit professional degree programs in architecture offered by institutions with U.S. regional accreditation, recognizes three types of degrees: the Bachelor of Architecture, the Master of Architecture, and the Doctor of Architecture.

Doctor of Architecture and Master of Architecture degree programs may require a pre-professional undergraduate degree in architecture for admission. However, the pre-professional degree is not, by itself, recognized as an accredited degree. VolEd University’s School of Architecture, Planning and Landscape Architecture offers the following NAAB-accredited degree programs: B. Arch. (150 undergraduate credits)
Post-Graduation Opportunities

• **Most Common Area of Concern:**
  – Inability to demonstrate 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
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 Responses:
  – “The Certifying Officials are familiar with Title IV policies/procedures...”
  – “Veteran students may contact the Bursar's Office or the Records Office for notification of TA program benefits....”
  – The evaluation team is unable to determine if these institutions have knowledgeable POCs
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:
  – Thorough description of the duties and responsibilities of the institution’s primary PoC for military-connected students
  – Included a detailed position description, detailing required knowledge, skills, and abilities
Financial Matters

• 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
  – Lack of evidence relating to qualifications of financial aid advisors

• Potential Ramifications:
  – Service members could receive inaccurate/incomplete/confusing information to use in their educational decision making
  – Could lead to unwanted financial burden
Common Non-Compliance

• Self-Assessment Question:
  – “Provide evidence that the institution provides access to a trained, qualified financial advisor prior to offering, arranging...or enrolling Service members for federal or private student loans.”

• Non-compliant Responses:
  – Individual names with years of experience
  – Redirects to course catalog or financial aid page, no evidence of qualifications
  – “Veteran students may contact the Bursar's Office or the Records Office for notification of TA program benefits...”
Best Practice

Tuition & Cost of Attendance

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

<table>
<thead>
<tr>
<th>Date</th>
<th>Action</th>
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<tbody>
<tr>
<td>April 1, 2018</td>
<td>Applications accepted</td>
</tr>
<tr>
<td>April 23, 2018</td>
<td>Accept admission deadline</td>
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<tr>
<td>May 1, 2018</td>
<td>Official transcripts due</td>
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</tbody>
</table>
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

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<th>Date</th>
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<tr>
<td>February 15</td>
<td>FAFSA application due</td>
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<tr>
<td>March 1</td>
<td>Complete IDOC</td>
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<tr>
<td>March 15</td>
<td>Financial aid notifications sent</td>
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<tr>
<td>June 1</td>
<td>Scholarship application deadline</td>
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Quick Links

U.S. Department of Education
Recruiting, Marketing, and Advertising

- **Recruiting Common Area of Concern:**
  - Incomplete guidance on TA processes, including:
    - Application process
    - Links to Service education portals
    - Guidance directing students towards ESOs and other military education personnel
  - Lack of institutional policies promoting behaviors consistent with ED regulations on misrepresentation

- **Potential Ramification:**
  - Service members could receive inaccurate, incomplete, and/or confusing information to use in their educational decision making
Military Tuition Assistance
The Armed Forces offers soldiers, sailors, marines, guardsman, and airmen several programs to support their education goals including up to 100% Tuition Assistance for college courses taken during off-duty hours. For more information on each military branch's tuition assistance program and application process, click [here](#).

Hyperlink to an informational website, not an official DoD or Service site
The Tuition Assistance (TA) program pays the cost of tuition and some additional fees. Nearly all active duty military service members are eligible for TA. However, each service branch determines eligibility criteria that often reduce access. Tuition Assistance covers up to 100% Tuition and Fees, not to exceed $250.00 per semester credit hour or $4500.00 per fiscal year.

All Active Duty Service Members (including Guard and Reserve) must contact their Education Service Officer (ESO) or Education Counselor within your branch of service prior to enrolling in any college or university.

Tuition Assistance Application Procedures for Military Services:
- Army
- Navy
- Coast Guard
- Marines
- Air Force

Hyperlinks to official Service websites
Recruiting, Marketing, and Advertising

• Marketing & Advertising Common Area of Concern:
  – DoD and/or Military Service insignias and/or logos being displayed on institution websites, providing an implied endorsement by the DoD that could be misleading

• Potential Ramification:
  – Service members could inaccurately construe advertising materials as an endorsement from the DoD/Service
Thank you for your Service in the Armed Forces

VolEd University is committed to ensuring the success of all military-connected students in their pursuit of attitudes, skills and habits of lifelong learning and leadership. We support veterans, military servicemembers, spouses, dependent children, caregivers, survivors and ROTC cadets.
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 their military benefits.
Imagery Guidelines

• Authorities:
  – Department of Defense Instruction (DoDI) 5410.20, September 2016
  – DoDI 5040.02, October 2011
  – Guidelines on the Use of Department Seals, Logos, Insignia, and Service Medals, October 2015
  – DoDI 1322.25, July 2014
  – Title 10, U.S. Code, Section 771
Imagery Guidelines

• **Visual Information** – Visual or pictorial representations of persons, places, or things, with or without sound

• **Examples of DoD Visual Information:**
  - Logos/Seals
  - Insignia
  - Uniforms
  - Equipment/Materiel
  - Command Crests
  - Patches
  - Medals

• **DoD Visual Information may not be used in a manner that could imply endorsement of a Non-Federal Entity**

• **The use of disclaimers can quickly defuse considerations of misleading advertising**
Way Ahead
Way Ahead

• Continue implementation of improved correspondence
  – Process improvements
  – Software implementation

• 2018 ICP Institutions provide Corrective Action Plan (CAP) and begin implementation of CAP

• Execute 2019 ICP cycle 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**
ICP Review Cycle

- 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 minimal findings will be exempt from random selection for three years/risk-based selection for one year
- Typical annual schedule:

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