

National Association of Veteran's Program Administrators Conference (NAVPA)

Compliance with E.O. 13607/MOU



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U.S. Department
of Veterans Affairs

OVERVIEW

- Principles of Excellence...
- PL 112-249: Improving Transparency...
- Compliance Progress

EO 13607: Principles of Excellence Implementation

Executive Order 13607, the Principles of Excellence (PoE), was established to strengthen oversight, enforcement, and accountability within the Department of Veterans Affairs' (VA) Post-9/11 GI Bill and Department of Defense's (DoD) Tuition Assistance Programs for educational institutions serving Veterans, Servicemembers, and dependents who receive funding from Federal veteran and military educational benefit programs

- Executive Order 13607 was signed by the President on April 27, 2012
- PoE will:
 - Provide information about the financial cost and quality of educational institutions;
 - Prevent abuse and deceptive recruiting practices; and
 - Ensure that educational institutions provide high-quality academic and student support.
- Completed Actions
 - February
 - ED released College Scorecard
 - VA Complaint System of Record Notice (SORN) submitted to Federal Register for public comment
 - March
 - Yellow Ribbon Program open season (March 15 – May 15) includes option to enroll in Principles of Excellence
 - Incorporated College Navigator into GI Bill website
 - VA Complaint System of Record Notice (SORN) approved

EO 13607: Principles of Excellence Implementation (con't)

- April
 - Targeted outreach to US News & World Report top schools to encourage participation
 - Targeted outreach to top veteran educational institutions to encourage participation
 - CFPB updated "Paying for College" website to include GI Bill calculator to aid in determining total cost for college
- May
 - Principles of Excellence Complaint Intake Questionnaire submitted to OMB
- August
 - 6,049 approved institutions have committed to the POE as of September 13, 2013
 - ED sent letter to POE schools reminding them to utilize Know Before You Owe financial aid shopping sheets
 - Signed a contract with BAM Technologies to build the centralized complaint system for VA
 - Principles of Excellence Complaint Intake Questionnaire resubmitted to OMB
 - DOD proposed an updated MOU with schools utilizing TA that incorporates all of the EO principles

Principles of Excellence – Centralized Complaint System

- VA and DoD will create a complaint system for students to register complaints that can be tracked and responded to
 - Building a centralized complaint with DOD to accept complaints through a online webform and the Education Service National Call Center.
 - Upon completion and approval from OMB VA can begin accepting complaints
 - Plan to begin accepting complaints late November 2013
 - Agencies are developing uniform procedures for receiving, processing, and sharing complaint information
 - Complaints will be reviewed by educational institutions, State Approving Agencies and will be forwarded to the Federal Trade Commission's Consumer Sentinel database.
 - FTC Database will be accessible to review external complaints, run reports, and identify trends that potentially warrant criminal or civil investigation

Principles of Excellence – Veteran Student Outcome Measures

- VA, DoD, and ED will develop Veteran student outcome measures
 - Purpose of Outcome Measures:
 - To ascertain success among Veterans in utilizing the GI Bill program.
 - To identify what the Veterans/Servicemembers need to know when choosing a school.
 - To identify what the Federal government should know to ensure an education program is appropriate.
 - Agencies are collaborating to define measures and cohort requirements and begin data collection targeted for Sep 2013
 - The proposed list has been vetted with VSOs and higher education associations
 - Retention rate
 - Persistence rate
 - Course completion rate
 - Transfer-out rate
 - Graduation rate
 - Certificate completion
 - Number of years to complete degree/certificate
 - Number of institutions attended to complete program
 - Median Federal student loan borrowing
 - Federal student loan default rate
 - Average salary
 - Unemployment rates
 - Employment in field of study

Principles of Excellence – Risk Based Program Reviews

- VA will establish procedures for Risk-Based Program Reviews of institutions to ensure compliance with the Principles
 - VA in partnership with NASAA established a Risk-Based Review sub-working group in April to:
 - Update compliance survey procedures to incorporate Principles of Excellence
 - Develop procedures to conduct Risk Based Program Reviews
 - Developed risk matrix for red flags with triggers and examples that may generate a risk based review
 - Developed draft procedures to conduct Risk-Based Program Reviews
 - Currently in review within VA
 - Coordinating with DoJ to conduct Fraud Awareness Curriculum for Complaint Case Managers, ELRs/ECSSs, and SAAs
 - To be conducted in conjunction with launch of PoE Complaint System
 - Training projected for November 2013
 - Begin assessment of POE with FY14 compliance survey schedule

Principles of Excellence – Comparison Tool

- VA will provide prospective military and veteran students, prior to using their benefits, streamlined tools to compare educational institutions using key measures of affordability and value
 - Initial Actions:
 - Link on eBenefits to College Navigator
 - College Navigator embedded into GI Bill Website
 - Phase I (Sep 2013):
 - Value of their GI Bill at a particular school (estimator)
 - School indicators (similar to college scorecard)
 - Veteran indicators (e.g., PoE, Yellow Ribbon, GI Bill beneficiaries)
 - Phase II (Apr 2014)
 - Individualized GI Bill benefits (calculator)
 - Veteran Outcomes
 - Complaints / Feedback
 - Compare Multiple schools

PL 112-249, Improving Transparency of Education Opportunities for Veterans Act of 2012

- Comprehensive policy on providing education information to Veterans
 - Effective and efficient methods to inform individuals of their education and vocational counseling.
 - Centralized tracking and publishing of feedback from students and State Approving Agencies.
 - Web-based tool to compare programs and estimate GI Bill benefits.
 - Transition Assistance Program information accessible for future students and schools.
 - Not approve programs and/or schools that use enrollment incentives.
- Requirements
 - Develop regulations, procedures, and policies necessary to execute the law
 - Conduct two market surveys for online tools to do the following
 - Assess whether an individual is academically ready to engage in postsecondary education and training
 - Provide a list of providers of postsecondary education and training based on selected criteria
 - Submit 90-Day Report to Congress by April 10, 2013
- Implementation
 - Established Integrated Project Teams to implement PL 112-249
 - Created an integrated schedule for project management
 - Integrated deliverables from EO 13607 and PL 112-249 to capitalize on EO work completed

PL 112-249, Improving Transparency of Education Opportunities for Veterans Act of 2012 (cont.)

- Delivered 90-day report to Congress April 10, 2013
 - Provided summary of new policies and plan for implementing programs
 - Available at gibill.va.gov/documents/Report_to_Congress.pdf or gibill.va.gov > scroll down to Announcement feed
- Conducted market surveys for online tools to:
 - Assess whether an individual is academically ready to engage in postsecondary education and training or would need remedial preparation before beginning.
 - Based on the market survey results, CareerScope® was identified as the likely preferred commercially available off-the-shelf online tool.
 - Began pilot program of self-administered assessments at no-cost through gibill.va.gov. Since August 2013 nearly 2,100 individuals have used the CareerScope® tool.
 - Provide a list of providers of postsecondary education and training based on selected criteria.
 - The recommended interim solution for the Comparison Tool includes working with ED to create a Benefit Estimator tool with College Navigator hosted on gibill.va.gov and eBenefits.va.gov
 - The long-term approach for the Comparison Tool with additional enhancements targeted for April 2014

PL 112-249, Improving Transparency of Education Opportunities for Veterans Act of 2012 (cont.)

- Conducting national campaign to promote Chapter 36 Vocational Counseling for Veterans through the Vocational Rehabilitation and Employment program
 - VBA is promoting vocational counseling through the VetSuccess on Campus Programs at 35+ schools
 - A letter is sent to all Veterans on academic probation informing about counseling through CH36
 - VBA is developing a larger outreach strategy to include all schools approved for CH33
- Providing assistance to School Certifying Officials for certifications and reporting
 - Training conferences
 - Comprehensive SCO Handbook
 - Education Service Webinars
 - Online resources – <http://www.gibill.va.gov/school-certifying-officials/>
- Facilitating information sharing between State Approving Agencies and accrediting agencies on program approval and evaluations of schools
 - VBA is working with the State Approving Agencies and the Department of Education to draft coordination procedures with accrediting agencies
- Developing policy on prohibition of certain uses of inducements by educational institutions (commissions, bonuses, or incentive pay for securing enrollments, financial aid, etc)
 - VBA is working with ED to capitalize on existing policy and best practices to create VA's policy

Breaking News - Compliance Progress

Education Compliance Surveys

- In partnership with SAAs, VA ensures schools and training establishments are in compliance with all applicable provisions of the laws administered by VA
- In FY12 VA and SAAs completed over 4,700 compliance reviews of schools, an increase of more than 147% over FY11 (1,900)

Compliance Survey Redesign Working Group (CSRWG) Established Sep 2012

- Examine all aspects of the Compliance Survey process in order to make mutually agreed upon modifications which ultimately provide improved delivery of educational benefits to Veterans
- Made up of VBA and National Association of State Approving Agencies (NASAA) leadership and representatives

Accomplishments

- Reduced number of compliance visits per SAA staff member to 20
- SAAs may conduct supervisory/technical visits
- FY 13 Compliance Guidance reduced number of files to be reviewed
- Piloted new “Referral Process” streamlining correction of survey discrepancies
- Implemented “Best Practices” student worksheet developed by an SAA
- Results: compliance survey time reduced significantly
- FY 14 Compliance Guidance exercises VA wavier authority

Compliance streamlining = more time for discretionary visits, outreach, training, and approvals

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Principles of Excellence – Outcome Measures DURING SCHOOL

During School	Definition	Measurement Groups	Notes
Retention Rate	% of first-time beneficiaries who complete their educational program or return to the same institution to continue their studies the following year.	Any first time students/beneficiaries enrolled in the institution in a given year.	Measured year to year
Persistence Rate	% who completed a program or enrolled for credit at any institution in two consecutive years	Any first time students/beneficiaries enrolled in an institution in a given year	Measured year to year
Course Completion Rate	% of courses attempted for credit that were successfully completed (received a passing grade) in a given year.	Any student who enrolled in a course for credit in the current year	Measured year to year

Principles of Excellence – Outcome Measures

GRADUATION

Graduation	Definition	Measurement Groups	Notes
Transfer Rate	% of the full-time, first-time beneficiaries who transferred to another institution. within 150% of normal time.	Any first time, full-time beneficiaries enrolled in the institution in a given year followed by 150% normal time.	Measured by 150% normal time
Graduation Rate	% of first-time, full-time students who complete a degree or certificate with 150% of normal time.	Any first time, full-time beneficiaries enrolled in the institution in a given year followed by 150% normal time.	Measured by 150% normal time
Certificate Completion	# of degree or certificates completed by all students/ beneficiaries within a given year.	Students completing a degree or certificate in a given year.	Measured year to year
Number of Years to Complete Degree/Certificate	Average number of years that it takes a student/beneficiary to complete a degree or certificate.	Students/beneficiaries who complete a degree or certificate within a given year.	Measured year to year
Number of institutions attended to complete degree	Average number of institutions attended by a student/beneficiary prior to degree or certificate completion.	Students/beneficiaries who complete a degree or certificate within a given year	Measured year to year
Average student loan debt	Median amount of Federal student loans borrowed for beneficiaries' undergraduate study at the institution.	Beneficiaries who borrowed for their undergraduate study at the institution and who graduated or withdrew from the institution in the given year	Measured year to year

Principles of Excellence – Outcome Measures

POST-GRADUATION

Post Graduation	Definition	Measurement Groups	Data availability not yet established for this category
Salary	Average annual earnings for beneficiaries two years after they complete their degree or certificate	All students/beneficiaries who completed two years prior.	Measured 2 years after graduation
Employment in field of study	% of beneficiaries who completed and are now working in an occupation field related to their field of study (as defined by BLS).	Students who graduated or withdrew from the institution a specified number of years prior	Measured TBD years after graduation
Unemployment	% of beneficiaries who completed or withdrew who are not currently enrolled in and are looking for work, but not employed	Students who graduated or withdrew from the institution a specified number of years prior	Measured TBD years after graduation
Student Loan Default rate.	% of beneficiaries who took out Federal student loans and defaulted on those loans within 3 years of entering repayment. (CDR)	All borrowers who entered repayment three years prior	Measured 3 years after leaving school.