

GAVCO 2014: Conducting a Compliance Survey

You are here

We are here
to help you
find your way



Compliance Objectives

- Verify benefit payments
- Provide a reasonable basis for cooperating with SAAs (approval issues)
- Assist certifying officials in better understanding VA rules & regulations
- Determine if there has been any deviation from VA policy
- Assist in correcting discrepancies

Notification Procedures

- Fax, email, telephone, or regular mail
- List of students and survey instructions will be provided
- Quiet work environment for review
- Time limit for records review
- Student interviews on voluntary basis

Files Requested

- Transcripts (unofficial copy)
- Prior Training Credits
- VA Documents
- Advertising Material
- Tuition and Fees Charges
- Student Account Records for CH 33
- Degree Plans (past & present)
- Notify Business Office of Visit

Areas of Review

- Program Approval
- Course Applicability
- Prior Credit Evaluated
- Term Dates Certified Accurately
- Credit, Clock, Remedial/Deficiency Certified
- Student Status Changes (within 30 days)
- School's Academic Policies Enforced
- Tuition, Fees, and Yellow Ribbon Reported

Compliance Survey Tips

- 30-Day review of student progress
- Suggested file organization (WAVES)
- Accurate degree audits
- Accurately & promptly report changes
- Adjustments
- Amendments
- Terminations

Common Errors Found

- Courses not in degree plan
- Degree plans not followed
- Repeat of successfully completed courses
- Timely reporting (within 30 days)
- No supplemental or concurrent documents
- Erroneous certifications
- Changes in tuition, fees, or Yellow Ribbon not reported
- CH33 funds posted or returned incorrectly

REPORTING FEES

- *Effective October 1, 2011, VA requires all **reporting fees** to be used exclusively in support of school efforts to certify the enrollment of their VA students.*

What is a reporting fee?

- It is a payment made by VA to a school or facility based upon the total number of VA students that were certified to VA at least once during the calendar year. Each VA student (no matter how many times certified during the year) is counted **one** time
- VA will pay \$12 per student (in prior years, it was \$7 per student) or \$15.00 per student if facility delivers an advanced pay check (in prior years it was \$11.50 for advanced pay delivery) around February of each year for the previous calendar year

REPORTING FEES

- **What types of expenditures are allowed?**
- The law now requires that this reporting fee be used only for the purpose of certifying the enrollment of VA students. It may not be used for any purpose not related to the certification of VA students for GI Bill benefits. Some examples of allowable expenditures are:
 - VA conferences
 - Items for a Vet Center (e.g., supplies, furniture, banners, etc.)
 - NOTE: It is important that the schools and facilities prioritize the use of those funds so that attendance at training sessions and conferences are not curtailed due to lack of travel funds. We pay close attention to this. Please focus on the funds being used primarily for attendance at training sessions
 - Salary support of a certifying official at the school as long as their job consists **entirely** of VA-related responsibilities
 - NOTE: Again, it would be frowned upon if the entire reporting fee was used for a salary, and nothing was left to send an individual to a VA-related conference. Additionally, a red flag would go up if funds went toward an employee who was also working in another department

REPORTING FEES

How far back do you need to provide the information?

- Since this provision did not go into effect until October 1, 2011, we would not go any further back than the first reporting fee payment by VA after that date

What happens if we conduct a compliance visit and it is determined that the funds were not appropriately used?

- The reporting fee will be barred until the school agrees to disburse – and actually does disburse – the fee as the law requires

From PL 111-377, Section 203:

(b) Use of Fees Paid.--Such section is further amended by inserting after the fourth sentence the following new sentence: ``Any reporting fee paid an educational institution or joint apprenticeship training committee after the date of the enactment of the Post-9/11 Veterans Educational Assistance Improvements Act of 2011 shall be utilized by such institution or committee solely for the making of certifications required under this chapter or chapter 31, 34, or 35 of this title or for otherwise supporting programs for veterans.".

(c) Effective Date.--The amendments made by this section shall take effect on October 1, 2011.

Compliance Survey Results

- Exit interview with school officials
- Discrepancies sent to adjudication for correction
- School receives a report of findings
- SAA referrals if deemed necessary

Questions

