

Voluntary Education Program Readiness (Force Education & Training)

DoD Institutional Compliance Program: Year Three, What Did We See?

March 2020



Agenda

- Introductions
- VolEd Overview
- Institutional Compliance Program
- VolEd CRM Compliance Tool Preview
- Way Ahead
- Questions



Introductions



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



Scott Flood is currently a Managing Consultant at Guidehouse, providing consulting services to the Defense Department. He is the Project Manager for the Institutional Compliance Program (ICP) project, and has been spearheading the effort since its inception in 2016.

VolEd Overview



Strategic Plan

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

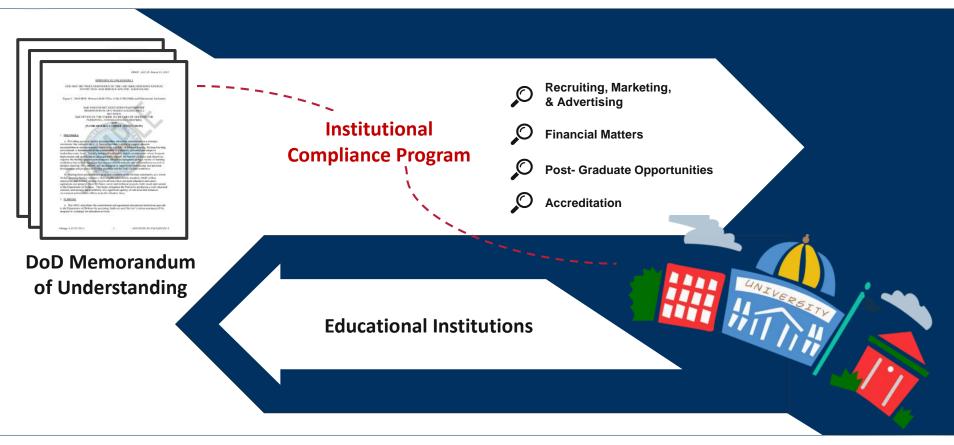
Focus Area Four

Cultivate a Culture of Organizational Effectiveness

Institutional Compliance Program (ICP)



ICP Overview



Open Communication Supporting a Culture Of Compliance

ICP 2019 Overview



Focus Areas

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 accreditation requirements?

Post-Graduate Opportunities

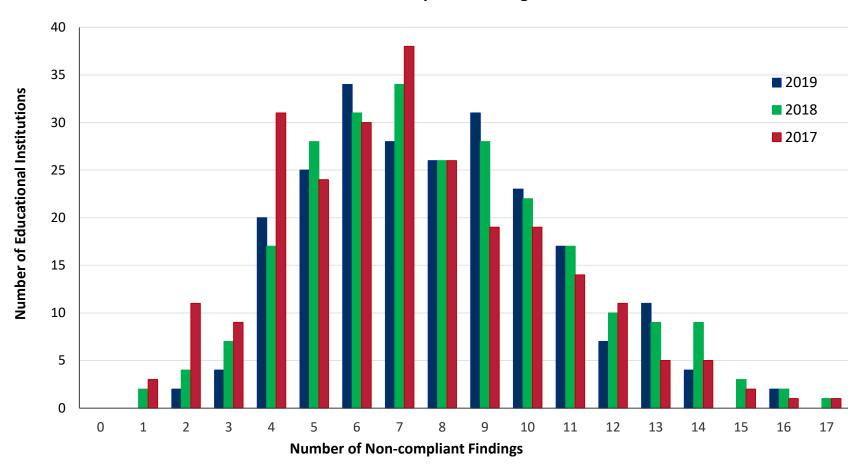
 Are Educational Institutions providing accurate information on post-graduate employment opportunities, so that students can make informed decisions?

Risk factor evaluations and assessment evaluations utilized over 22,000 pieces of data



ICP Trends 2017-2019

Non-Compliant Findings

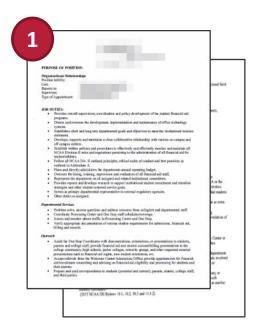


Common Non-compliant Findings



Key Points of Contact

MOU Paragraph 3.g – Designate a point of contact or office for academic and financial advising, including access to disability counseling, to assist Service members with completion of studies and with job search activities.



Qualifications provided with the Self-Assessment



POCs listed on institution's website



Refund Policy

MOU Paragraph 4.f.(2)(d) – "Have an institutional policy that returns any unearned TA funds on a proportional basis through at least the 60 percent portion of the period for which the funds were provided."

Minimum information required:

- At what point is the refund no longer 100%?
- What is the amount of the refund when the course is 60% complete?
- At what point is the refund 0%?

Actual amounts are at the institution's discretion

Generic Sample		
Week	% Complete	% Returned
X	?	100%
Υ	60%	?
Z	?	0%

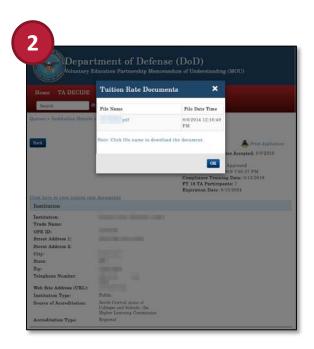


DoD MOU Tuition

MOU paragraph 4.(a) – "All Service members attending the same educational institution, at the same location, enrolled in the same course, will be charged the same tuition rate without regard to their Service component."



Institution's financial aid page



Institution's dodmou.com page



Gainful Employment Policy

- In July 2019, ED rescinded the Gainful Employment
 Disclosure requirements → <u>effective July 2020</u>
- Prior to July 2020, institutions can "early implement"
 - Early implementers must internally document the decision,
 and make that documentation available upon request
 - Those that do not early implement must continue to comply until July 2020
- For ICP 2017-2019 institutions, these rules continue to apply until July 2020
- For ICP 2020+ institutions, this requirement no longer applies

Way Ahead



ICP 2020

Selection Process – Complete

Key Dates:

- Announcement 07 February 2020
- Self-Assessments due 03 April 2020
- Feedback Reports transmitted ~ June 2020
- Corrective Action Plans due ~ Aug 2020
- Evidence due ~ Dec 2020



Process Lessons Learned

- Identified trends in a small number of evaluation items
 - Indicates the request for information is vague, or
 - The underpinning policy is ambiguous
 - Looking to clarify both to improve understanding
- Open, consistent communications is the key to success
 - Introducing improved processes and new tools to facilitate
 - Maintain privacy and confidentiality



Summary

- ICP provides the DoD with the ability to assess institutional compliance and provide constructive feedback
- Over 700 institutions have participated in the assessment and have the opportunity to improve compliance
- Trends have been consistent annually, indicating a need for enhanced communications across the enterprise
- New tools and processes being deployed to improve communications, streamline information exchange, and maintain synchronization

Questions