



**United States Department of Defense**  
**Office of the Under Secretary of Defense**  
**Personnel & Readiness**  
**Voluntary Education Institutional Compliance Program**  
FY2021 Summary

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## **Executive Summary**

Fiscal Year 2021 (FY21) was the first year under the follow-on contractual agreement for the Voluntary Education (VolEd) Institutional Compliance Program (ICP) project. The requirements and deliverables from the previous contract remained largely intact, so the ICP team was able to continue to apply the continuous process improvement mindset and implement enhancements to the project that increased its overall effectiveness and efficiency.

FY21 operations were still largely affected by restrictions and inefficiencies driven by the global pandemic, and the ICP team remained flexible in its approach to executing the project. Furthermore, an unexpected DoD IT migration in the middle of the performance year – during a time when the ICP team was expecting hundreds of submissions across two ICP cycles – left the VolEd Compliance Inbox inoperable for several days. Since this inbox is currently the primary means of communications between the VolEd Office and their stakeholder population, this caused a significant interruption in the team’s ability to accept institutional submissions and interact with the Points of Contact. Once this issue was resolved, and the damage repaired, the ICP team was able to resume relatively normal operations.

The team also made great strides in the implementation and adoption of the VolEd Customer Relationship Management (CRM) tool, which will allow the VolEd Office to maintain ideal situational awareness over the voluminous communications that take place annually between the DoD and the 2,600+ partner institutions. Analysts within the office are able to utilize the tool, and most of its functionality, and preparations are underway to establish communications portals in the tool for each institution participating in the annual ICP assessment.

There were also a number of leadership changes in the VolEd Office during the early parts of FY21 which led to new guidance on selected processes and procedures that the ICP team implemented. Some of those processes were reversed later on in the year.

Overall, the business processes continue to evolve and the ICP team continues to support the VolEd Office in their execution of their overarching compliance program.

## **Purpose**

The purpose of this document is to provide a record of the accomplishments of the ICP team in its execution of the first year of the second iteration of the contract with the VolEd Office. This document will also include supplemental lessons learned that can be applied to future cycles.

## **Background**

Under the direction of the Under Secretary of Defense for Personnel and Readiness (USD P&R) and the Assistant Secretary of Defense for Readiness (OASD(R)), the Department of Defense Voluntary Education (DoD VolEd) program within the Office of the Deputy Assistant Secretary of Defense for Force Education and Training (ODASD(FE&T)) oversees the Tuition Assistance (TA) program that provides education benefits to active duty and reserve Service members. In Fiscal Year 2020 (FY20), the TA program funded over 628,000 courses for over 225,000 military students, at a cost of nearly \$500M.

Per DoD policy, in order to participate in the TA program and receive TA funding, educational institutions must sign a VolEd Partnership Memorandum of Understanding (MOU) with the DoD. To be eligible to enter into the MOU, an educational institution must be accredited by an accrediting organization recognized by the Department of Education (ED), approved for Veteran Affairs (VA) funding, and certified to participate in federal student aid programs through the ED under Title IV of Public Law 89-329, also known and referred to in this instruction as the Higher Education Act of 1965.

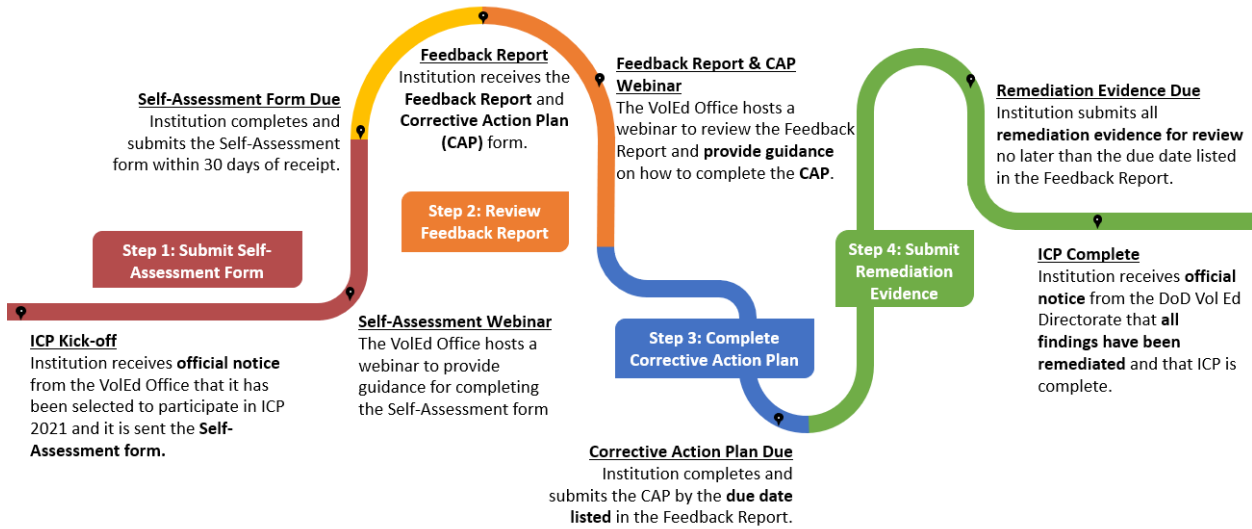
By signing the MOU, institutions agree to a set of behaviors, processes, and policies – all focused on improving program delivery to Service members. For example, the MOU requires educational institutions to avoid aggressive recruiting practices, provide clear and consistent information on pricing and loans available to military students, and to follow DoD rules related to base access. The DoD VolEd MOU Partnership ICP is a full-scale, risk-based compliance program that assesses institutional compliance with these standards, in order to reduce risks associated with non-compliance.

Each year, the ICP team considered the entire population of MOU signatories, leveraged over 24,000 pieces of data to narrow the population from over 2,600 to 250, and then conducted an in-depth assessment on those 250 institutions. The team then provided critical feedback to those institutions to enable them to implement Corrective Action Plans (CAPs) to improve their individual level of compliance with the tenets of their MOUs.

Given that FY21 was the 5<sup>th</sup> iteration of the ICP, the team was able to apply multiple lessons learned to continue to improve communications with the educational institutions, manage expectations, and shorten process timelines.

An ICP cycle is a collaboration between the selected set of educational institutions and the ICP team, and consists of the following steps:

### Institutional Compliance Program Roadmap



During each phase where the Institutions are responsible for providing compliance-related information, they are given a sufficient amount of time to develop this data and submit it. To date, it has been VolEd direction to develop and transmit feedback reports en masse, so that all institutions can be held to the same deadlines. Therefore, step 2 in the diagram above cannot be completed until all institutions have provided their self-assessments. When one or more institutions is delayed in meeting this requirement, the entire process is slowed down. This will be discussed further in the Lessons Learned section.

### Accomplishments

When the FY21 period of performance began for the ICP team, there were still 3 concurrent ICP cycles in progress, namely ICP18, ICP19, and ICP20. The impacts of the global pandemic were still affecting the ability of the institutions to respond to DoD requests for information in a timely manner, but the ICP team continued to monitor progress and elevate issues to government officials when warranted.

**ICP18:** At the beginning of the performance year, ICP18 had three educational institutions that still owed VolEd critical info. The ICP team was able to quickly close out the FY18 cycle.

**ICP19:** At the beginning of the performance year, ICP19 had 29 institutions that still owed the DoD their remediation evidence. At year’s end, one institution remained, and they were offered the opportunity to move forward and be a part of the ICP21 cycle, so that ICP19 could be closed out.

**ICP20:** ICP20, which was launched in March of 2020, was greatly impacted by the global pandemic, as self-assessments were due back at the same time as when normal operations began to shut down and be taken remotely. This affected the ICP20 institutions from being able to complete their self-assessments, which were due in May, and 16 institutions had still not provided them at the beginning of this period.

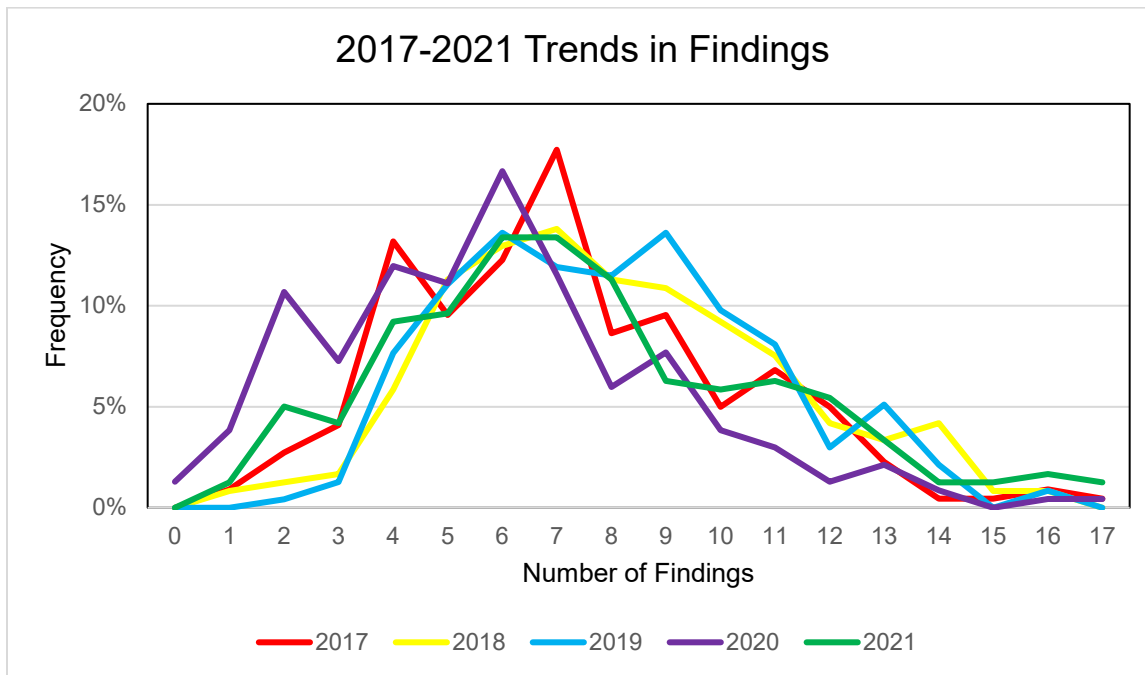
At year’s end, there was still one institution that had not provided their self-assessment, and the ICP was working diligently to get that institution into compliance. The remainder of the population had completed the cycle, or had their remediation evidence under review by the end of the performance year.

**ICP21:** The ICP21 cycle began in December of 2020. The leadership in the VolEd Office and within the Office of the DASD(FE&T) wanted to begin this cycle before the new incoming Presidential administration was put into place. The team was able to meet this request.

There was a considerable amount of discussion regarding the use of the risk model, its ability to accurately predict performance in the ICP, and its usefulness as a selection tool. In the end, the ICP team was directed to select the population of 250 using only a random selection methodology, to exempt all other previous participants in earlier annual cycles, and to not consider any schools that had no TA students in the preceding four years. The ICP team followed this guidance, and the ICP21 cycle officially commenced with announcement letters transmitted on January 7, 2021.

By the end of the performance period, there was one institution remaining that had not submitted their self-assessment, and 15 institutions had not yet provided their CAP. The remaining 225 institutions had submitted their CAPs and were working on their remediation activities.

The trends in the findings, shown below, remained consistent across the first 5 years of the ICP assessments. While this provides some evidence that the assessment processes used over time remained consistent, it also showed that the effects of the assessments themselves were not being promulgated across the institutions that had not been part of an assessment cycle yet.



**Council of College and Military Educators (CCME):** For the 5<sup>th</sup> consecutive year, the ICP team supported the VolEd Office at the annual CCME conference. This conference, held in June

of 2021, was a virtual meeting, due to pandemic concerns. The joint briefing provided the attendees with an overview of historical findings, along with best practices for completing the assessments, and improving their overall level of compliance independent of being involved in an annual assessment. Unfortunately, the virtual nature of the conference did not allow the ICP team to personally interact with members of the stakeholder community, as we had in the past.

**Service-Level Assurance:** During the FY21 period of performance, the ICP team made additional strides in developing a way ahead for a program that will enable the DoD VoEd Office to evaluate the performance and compliance levels of the individual DoD Service VoEd Offices.

The ICP team developed an implementation plan that provided updated visions and goals, a phased implementation methodology, a strategic communications approach, and potential measures of effectiveness. Other, more pressing responsibilities within the VoEd Office have put the actual implementation of this plan on hold until further notice, but the ICP team stands ready to execute.

**Customer Relationship Management (CRM) Tool:** The ICP team continued the momentum on the CRM tool from the previous year, and began utilizing the tool internally within the VoEd team. Personnel were getting more comfortable with the functionality and the usefulness of the system. Then, during the year, there was an IT migration within the Pentagon's infrastructure, and a key function was disabled. The original plan called for the VoEd Compliance Inbox to automatically forward, and meta-data tag, all incoming messages to the CRM tool. This would automatically sort and store all communications with an institution and enable easy retrieval at a later date. With the migration, the automatic forwarding feature was disabled, and was not reinstated by the end of the performance year. The ICP team continues to try to repair this breakage in capability, which will give the CRM tool its full intended functionality.

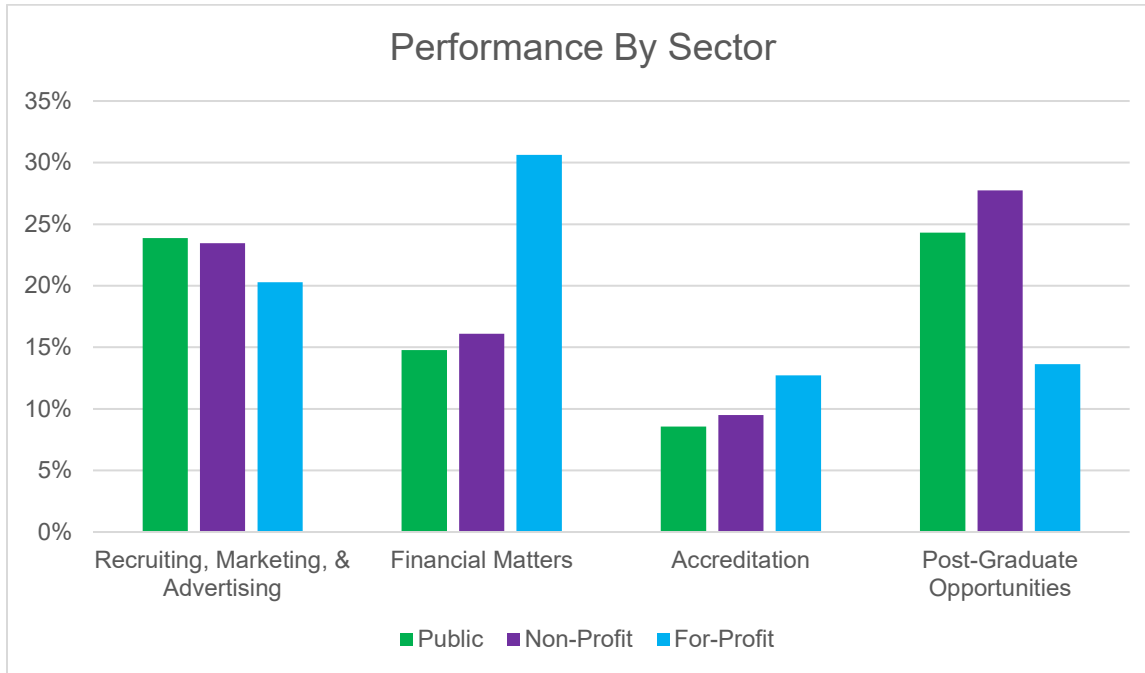
In the interim, the ICP team created work arounds that were not as efficient, but still managed to maintain full situational awareness on all of the incoming communications. The tool is being used on a daily basis to help support ICP operations.

The ICP also began preparing to use the CRM tool as the primary communications means for ICP22. The process moving forward will be to provide connection to a portal for each Point of Contact at the 250 institutions that are part of the assessment cycle, and allow them to use the portal for all of the collaborative communications with the ICP team. This will get the VoEd Compliance Inbox out of the communications process, and enable both sides to have a common operating picture of all of the historical communications between the institution and the ICP team.

## **Lessons Learned**

**ICP Findings:** As mentioned above, the ICP21 results were not statistically significantly different from the previous four cycles, in terms of the average number of non-compliant findings per institution or in the overall shape of the distribution. Additionally, the findings that appear the most often have remained largely the same over time.

The following graph shows how each sector performed across the four main assessment areas, in terms of the frequency of findings.



**Informational Webinars:** The ICP team continued to conduct tutorial webinars following the release of the self-assessments, and added a set of webinars following the distribution of the feedback reports. The ICP team received some positive feedback from the stakeholder group, but the tangible results were in the timeliness and accuracy of the responses by the institutions. Submissions, especially CAPs and Remediation Evidence, were coming in much sooner, and a much larger percentage of them were correct on the first attempt.

## Conclusion

Despite the unprecedented upheaval caused by the COVID-19 pandemic, in FY21 the ICP team was able to identify and implement many transformational changes to the overall TA program. The Lessons Learned Report and Visual Imagery Guidance are available for institutions to proactively improve their overall level of compliance. The ICP team’s informational webinars provide specific, detailed guidance to institutions on how to best complete the annual assessments. Finally, the implementation of the VolEd CRM tool will enable the VolEd Office to effectively manage their communications with their broad and diverse stakeholder community.