TRAINING OBJECTIVES

• Why compliance surveys are conducted
• When compliance surveys are conducted
• How compliance surveys are conducted
• How to best prepare for a compliance survey
WHY SURVEYS ARE CONDUCTED

Compliance surveys are conducted in order to ensure that schools/training establishments and their approved courses, are in compliance with all applicable provisions of the laws administered by VA.
Based on the facility’s overall veteran student population.

<table>
<thead>
<tr>
<th>VA Student Population</th>
<th>Records to Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 to 99</td>
<td>10</td>
</tr>
<tr>
<td>100 to 199</td>
<td>15</td>
</tr>
<tr>
<td>200 to 299</td>
<td>20</td>
</tr>
<tr>
<td>300 to 399</td>
<td>25</td>
</tr>
<tr>
<td>400 to 499</td>
<td>30</td>
</tr>
<tr>
<td>500 or more</td>
<td>35</td>
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</tbody>
</table>
Per the FY 2019 Guidance, records of any SCO who has received education benefits for attending the same facility will be included in the review sample.

Samples of review will be proportionally distributed by national benefit usage.

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>CH 33</td>
<td>Min of 80%</td>
</tr>
<tr>
<td>NON-CH 33</td>
<td>At least one of each type</td>
</tr>
</tbody>
</table>

25% of the CH 33 records reviewed must include Yellow Ribbon if the facility is a participant.
SELECTING STUDENTS

How are student files selected?

Randomly chosen by the VA/SAA employee who will be conducting your survey either by VA reports or VA-Once.
PERIOD OF REVIEW

How far back will records be reviewed?

- Student records from three prior academic years will be included if the facility had a student attending in that school year or the date of the last survey (if that record was included in the sample).
Compliance Surveys are usually conducted on-site however, under certain conditions, a remote survey review option could be used. The remote survey option is intended to make more efficient use of time and funds expended for travel while conducting compliance survey reviews.
WHAT WILL THE VA/SAA DO?

- Notify the facility by telephone, mail and/or email
- Schedule on-site survey or solicits for remote survey
- Provides random student names and specific documentation required for review
WHAT WILL THE FACILITY DO?

• Gather facility documents of **ALL** requested individual student records that are selected
• Provide any reports or questionnaires at the time of review
• May notify VA students of the survey and relay information on how to contact VA. Students can voluntary interview with VA during an on-site survey
• Provide quiet work environment for review
What gives us the authority to review all theses records without permission of each student?

Title 38 United States Code, Section 3690(c)

- The law (38 U.S.C. 3690(c)) provides that records and accounts must be made available for review by authorized representatives of the government "NOT WITHSTANDING ANY OTHER PROVISION OF LAW." The effect of this provision is to allow VA to examine necessary records that may be restricted under laws regarding privacy of student records such as PL 93-380 (Buckley Amendment) or other provisions of the law. Failure to make records available may result in discontinuance of educational assistance benefits.
How long does the facility have to maintain student records?

Records of an institution or establishment must be retained for a period of at least **THREE YEARS** following the termination of the enrollment of an eligible individual, or longer if requested by the VA or Government Accountability Office (GAO). 38 CFR 21.4209(f)
REQUESTED STUDENT DOCUMENTS

WHAT DOCUMENTS DO YOU NEED TO PROVIDE?

- Academic Files
- Financial Aid Files (Tuition/Fees Payment Ledger)
- Student Payment Records
- Application for Admission
- Program Curriculum
- Students Unofficial Transcripts
- Prior Credit Evaluation
- Degree Audit
- Enrollment Agreement
- Registration Information
- Drop/Add Slips
- Evidence of Remedial Training
- Attendance Records
REQUESTED SCHOOL DOCUMENTS

WHAT DOCUMENTS DO YOU NEED TO PROVIDE?

- School Catalogs
- Academic Calendars
- Schedule of Classes
- List of offered scholarships
- Enrollment Data to Verify Compliance with 85/15 Rule
- Yellow Ribbon Roster
- Advertising Material
- Questionnaire
- Principles of Excellence
- Priority Enrollment
- Reporting Fees Information
CONDUCTING THE SURVEY

Entrance Interview

• Introductions with certifying officials – other institution officials may be present
• Purpose of compliance survey explained in detail
• Advise of need for EXIT interview upon completion of review of records
Areas of review include but are not limited to:

- Verify Reporting Fees are being appropriately maintained and spent
- Prior Credit Evaluation
- Change of Program
- Dual Majors
- POE
- Priority Enrollment
- Trademark Violations – Verify advertising is in compliance with the law
- Workstudy
- Program approval and pertinent courses
- Accurate and timely certification of term dates and credit/clock hours
- Accurate and timely certification of tuition and fees
- Timely certification of changes in enrollment
- Standards of progress policy enforcement
Areas of Review
Program of Study

Program of Study

• Is student pursuing an approved program?

• Do courses certified fulfill a program requirement?

• Did student repeat any courses? If so, was repetition required?
Enrollment Data

• Were enrollment/term dates certified accurately?

• Were credit or clock hours properly reported?

• Did any status changes occur? If so, were they reported in a timely manner (within 30 days)?
Areas of Review
Progress

Progress

• Does the school have and enforce standards of progress?

• Does the school maintain records showing progress for each enrollment period?

• Did the student maintain satisfactory progress? If not, was VA notified?
Areas of Review
Previous Education and Training

Previous Education and Training

• Was prior education evaluated and appropriate credit granted?

• Do any of the courses certified represent duplication?
Charges

- Were charges for tuition and fees accurately reported to VA?
- Are fees mandatory and charged to all similarly circumstanced students?
- Are charges to non-VA students the same or more than the charges to VA students?
Other Areas of Review

- Compliance with 85/15 Ratio
- Reporting Fee Expenditure
- Advertising and Enrollment Practices
- Yellow Ribbon Program
- Work-Study
CONDUCTING THE SURVEYS

Exit Interview

• Discuss discrepancies with certifying officials – other institution officials may be present
• Advise of any corrections that will need to be made to certifications
• Provide any training needed
Punitive and non-punitive grades 38 CFR 21.4200

- Punitive grade-A grade assigned for pursuit of a course which is used in determining the student’s overall progress toward completion of the school’s requirements for graduation. Used in computation of the CGPA.

- Non-punitive grade-A grade assigned for pursuit of a course, whether upon completion of the course or at the time of withdrawal from the course, which has the effect of excluding the course from any consideration in determining progress toward fulfillment of requirements for graduation. No credit toward the school’s requirements for graduation is granted for such a grade, nor does the grade affect any other criteria for graduation by the policies of the school, such as GPA. Therefore it is the same as an Audited Course. 38 CFR 21.4135(e) and 21.4252(i).

- Audit course-The term means any credit course which a student attends as a listener only with a prior understanding between school officials and the student that such attendance will not result in credit being granted toward graduation.
POINT OF CONTACT
Points of contact

- SCO HOTLINE- 855-225-1153  7AM-5PM M-F CT
- ELR Mailbox- elr.vbasdc@va.gov
- Education Benefits- 888-GIBILL-1 or 888-442-4551
- Direct Deposit Enrollment (Students)- 877-838-2778
- Monthly Verification of enrollment-877-823-2378
- VA Debt Management Center – 800-827-0648
- VA SAA APPROVALS – 202-632-8701 and email ca-approvals@va.gov
SCHOOL RESOURCES

• SCO Hotline: 1-855-225-1159 (ONLY for SCO)

• FAQs: https://gibill.custhelp.com/app/answers/list

• ELR:

• SAA VA:
  https://gibill.custhelp.va.gov/app/answers/detail/a_id/1481/kw/1481
QUESTIONS?