Voluntary Education Program
Readiness (Force Education & Training)

Strengthen the Integrity of the DoD Tuition Assistance Program through Improved Oversight, Evaluation, and Enforcement Efforts

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Purpose

- To inform stakeholders about the myriad of tools used in enhancing oversight of the Tuition Assistance program.
- Promote understanding and support of DoD initiatives for enhanced compliance and enforcement.
- Equip stakeholders with the means to identify potential compliance deficiencies.
DoD Voluntary Education
(Program Impact)

- **2,700** academic institutions at over **12,500** locations participate in VolEd programs through a signed DoD VolEd Partnership MOU.
- At **283** education sites worldwide in Fiscal Year 2015:
  - **831,000** Service members participated in DoD VolEd programs (i.e., TA, testing programs, and counseling).
  - **286,000** Service members enrolled in more than **760,000** postsecondary courses at a cost of **$518.5M** (~$682 per course).
  - **52,000** college degrees and nearly **1,000** certificates were earned by Service members using TA.
  - **32,000** Service members registered for academic skills courses.
  - **152,000** tests were administered.
- As of FY 15, the Troops to Teachers program has placed over **19,000** teachers.
Compliance Drivers
(Principles of Excellence & DoD Instruction 1322.25)

Executive Order 13607, “Principles of Excellence” (April 27, 2012)
- Directs agencies to implement and promote compliance with Principles of Excellence for educational institutions that interact with Service members, Veterans and military families
- Establish guidelines for educational institutions receiving Federal funding
- Require institutions to provide information, support, and protections to Federal education beneficiaries
- Strengthen oversight, enforcement and accountability activities within educational benefit programs
- Expand student data collection efforts to better understand educational outcomes
- Require development of a Centralized Complaint System for students

DoD Instruction (DoDI) 1322.25, “Memorandum of Understanding” (July 7, 2014)
- Adjustment to TA eligibility criteria (Accreditation, Title IV, VA Approval, and State Authorization)
- Requirement of educational institutions to sign the Memorandum of Understanding (MOU) as a prerequisite to TA services for Service members and their families; implemented to capture feedback on the performance and services of educational institutions receiving TA
- Implementation of DoD Postsecondary Education Complaint System for Service members, spouses, and adult family members to register student complaints
- Educational institutions receiving TA are required to:
  - Provide information to students about the true financial cost.
  - Not use unfair, deceptive, and abusive recruiting practices.
  - Provide academic and student support services.
- Implementation of rules to strengthen existing procedures for access to DoD installations by educational institutions.
Principles of Excellence
(DoD Quality Assurance)
# Principles of Excellence

*(Agency Requirements)*

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<th>Require agencies to:</th>
<th>STATUS</th>
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<td>Identify outcome measures that will provide information on available educational programs to support informed decision making about educational choices.</td>
<td>Completed October 2013 <em>(DoD, ED &amp; VA)</em></td>
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<td>Create an interagency Centralized Complaint System.</td>
<td>Completed January 2014 <em>(DoD, ED &amp; VA)</em></td>
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<td>Establish new uniform rules and strengthen existing procedures for access to military installations by education institutions.</td>
<td>Completed July 2014 <em>(DoD)</em></td>
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<td>Provide military students, prior to using their benefits, streamlined tools to compare educational institutions using key measures for affordability and value through VA’s eBenefits portal.</td>
<td>Completed February 2014 <em>(VA)</em></td>
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<td>Establish procedures for targeted risk-based program reviews of institutions to ensure compliance with the principles.</td>
<td>Completed May 2014 <em>(VA)</em></td>
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## Principles of Excellence
### (Institution Requirements)

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<th>Require educational institutions to:</th>
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<td>Provide students with an Education Plan.</td>
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<td>Provide students with a personalized, standardized form with costs, financial aid and outcome measures.</td>
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<td>Inform students of the availability and eligibility Federal financial aid before arranging private student loans.</td>
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<td>End fraudulent and aggressive recruitment on military installations.</td>
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<td>Obtain approval of institution accrediting agency for new course or program offerings before enrolling students.</td>
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<td>Allow service members and reservists to be readmitted to a program if they are temporarily unable to attend class or have to suspend their studies due to service requirements.</td>
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<td>Have a refund policy that is aligned with the refund of unearned student aid rules applicable to Federal student aid.</td>
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<td>Designate a point of contact for academic and financial advising.</td>
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DoDI 1322.25, “Voluntary Education Programs:”
- Establishes Voluntary Education policy.
- States eligibility criteria for tuition assistance (TA).
- Requires signed memorandum of understanding (MOU) with DoD to provide educational programs and receive TA.
- Institutionalizes within DoD the Principles of Excellence in support of Executive Order 13607 (April 27, 2012).

DoDI 1322.25 Publication & MOU Implementation:
- Change 3 posted to DoD Issuances July 7, 2014.
- Existing MOU signatories required to sign the enhanced MOU by September 5, 2014.

Over 2,700 educational institutions have signed the DoD Voluntary Education Partnership MOU to date.
Information Sharing
(Among Federal Agencies)

- Established Joint Higher Education Memorandum of Understanding among Departments of Education (ED), Defense, Veterans Affairs (VA) and Consumer Financial Protection Bureau (CFPB) on July 18, 2014.

- Provide complaint data provided to the Federal Trade Commission's (FTC) Consumer Sentinel.

- Agencies share information:
  - Complaint data.
  - Reviews (i.e., third party, risk-based, program, compliance).
  - Administrative actions and/or eligibility determinations.
Third Party Review
(FY16 and Beyond)

- The Plan: Implement a multi-faceted Third Party Review process that improves departmental oversight through MOU compliance and institutionalization of POE.

- The Methodology:
  - Leverage interagency assets and collaboration to minimize duplicative and overlapping efforts in design.
  - Develop a review selection process based on analysis of all available data/information concerning an educational institution.
  - Design an MOU compliance tool and sound enforcement process.
  - Select appropriate vehicle(s) to facilitate third party review.
  - Share findings with other federal agencies/regulators.

- Third Party Review acquisition anticipated later this fiscal year.
Third Party Review
(Compliance Review)

- Educational institutions participate in the Third Party Review process when requested.

- Selection for Third Party Review may be based on:
  - Provider offerings (on-installation, off-installation, or DL).
  - Education benefits received (large provider in terms of enrollments or TA funds).
  - Reports of non-compliance with signed MOU with DoD.
  - Complaint(s) received.
  - Negative information received from other federal agencies and regulators.

- Unwillingness to resolve Third Party Review findings may lead to a range of penalties from a written warning to revocation of the DoD MOU and removal from participation in the DoD TA program.
Centralized Complaint System
(An Interagency Effort)


- Intended for complaints directly related to “Principles of Excellence.”

- DoD will work with the educational institution and student to reach resolution satisfying both parties, where possible.

- ALL verified cases are submitted to the FTC’s Consumer Sentinel System for monitoring and potential law enforcement action.
Centralized Complaint System
(FY15 TA Complaints)

- TA Complaints Submitted: 185
- Closed TA Complaints: 129
  - POE Complaints: 78 (60%)
  - Non-POE Complaints: 51 (40%)
- POE TA Complaints By Sector: 93
  - Private For-Profit: 50 (54%)
  - Public: 33 (35%)
  - Private Non-Profit: 10 (11%)
- Top 5 Issues Reported: Financial Issues (e.g., tuition & fees charges), Refund or Collection Issues, Quality of Education, Release of Transcripts, and Grade Policy.

DoD MOU Non-Compliance  
(Reporting Non-Compliance)

- DoD will work with educational institutions to resolve any reports of non-compliance submitted to osd.pentagon.ousd-p-r.mbx.vol-edu-compliance@mail.mil.

- Educational institutions having recurring, substantive reports of non-compliance or demonstrating an unwillingness to resolve reports of non-compliance may face a range of penalties from a directed Third Party Review to revocation of the DoD MOU and removal from participation in the DoD TA program.

- As appropriate, DoD will refer non-compliance reports to other government agencies/regulators including but not limited to the FTC, Department of Justice (DOJ), CFPB, VA, and ED.
DoD MOU Non-Compliance
(What to Report)

- Educational Institutions that:
  - Do not comply with DoDI 1322.25 or DoD MOU provisions.
  - Use unfair, deceptive, abusive or fraudulent devices, schemes, or artifices, including misleading advertising or sales literature.
  - Engage in unfair, deceptive, or abusive marketing tactics, such as during unit briefings or assemblies; engaging in open recruiting efforts; or distributing marketing materials on the DoD installation at unapproved locations or events.
  - Market to or recruit newly assigned military personnel to the DoD installation, unless the Service member has received information about voluntary education programs and services available at that DoD installation, to include TA, from their education services staff or as part of their orientation to the new DoD installation.
  - Provide programs/services not in accordance with the requirements of the contract and/or agreement.
Trademark Infringement
(DoD and Military Seals)

The following DoD and Military Seals may be used only by DoD and the Military Departments for official purposes and are protected by law from unauthorized use.

There is no substitute for the DoD Seal, and there is NO optional graphic that represents the DoD.

Each Military Service has a trademark licensing program office that manages its many trademarks. These protected marks (emblems, coats of arms, initials, symbols and other military identifiers) may not be used without prior written permission.
Trademark Infringement
(Trademark and Licensing Provisions)

- Trademark infringement reminder notices transmitted to all DoD MOU participating institutions in March and July 2015.


- Educational institutions must consult the appropriate Military Service Trademark Licensing Program Office for a written determination regarding any request to use Military Service insignia (http://www.defense.gov/Media/Trademarks).

- For general information on other limitations for public use, visit http://www.dimoc.mil/resources/limitations.html.
DoD Installation Access

(Access Provisions)

Access to DoD installations is permitted only to: deliver on-installation education programs or services, provide education guidance to students, and/or participate in sanctioned events (i.e., education fairs).

- Signed DoD MOU required.
- Overseas limited to contracted providers.

Access provisions apply to the educational institution itself and its agents including third party lead generators, marketing firms, or companies that own or operate the educational institution.

Educational institutions or their agents that gain access for the performance of contracted services are permitted only in accordance with the requirements of the contract and/or agreement.
DoD Installation Access
(Definitions)

DoD Installation: Any active duty military, Reserve or National Guard owned, leased, or operated base, reservation, post, site, camp, building, or other facility to which DoD personnel are assigned for duty. This includes but is not limited to locations at an active duty military installation, Reserve and National Guard facility (state readiness center, armory, unit, etc.), or recruiting center (leased space inside a shopping mall or office building).

Personal Commercial Solicitation: Any contact by an educational institution with a Service member for the purpose of asking or encouraging the member to sign up for one of the educational institution’s programs (assuming the program has some cost) is considered personal commercial solicitation.
DoD Installation Access
(Commercial Sponsorship/Advertising)

- Agreements should not conflict with the DoD Voluntary Education Partnership MOU and governing regulations.

- Educational institutions entering into such agreements are not automatically granted DoD installation access. Agreements may be permissible when vetted through the responsible education advisor.

- Specific areas of concern include, but are not limited to, activities that may be considered personal commercial solicitation, misrepresentation, or recruitment by their nature (i.e., setting up a table and handing out sales literature, donations in exchange for physical presence, advertising ineligible programs, handing out items having more than a de minimis value, and obtaining contact information of event participants).
DoD Installation Access
(Access Requests)

Educational institutions may request installation access for permissible activities (to provide programs, services, and education guidance to their students or to participate in sanctioned events such as education fairs). The educational institution must:

• Submit a written request to the responsible education advisor who will review on behalf of the installation commander.
• Have a signed Voluntary Education Partnership MOU with DoD.
• Be in compliance with state requirements and laws.
• Have a minimum of 20 military-connected students enrolled at that installation for academic counseling or support services provision.
• Sign an installation-specific MOU to provide on-installation education programs or services; in addition to DoD MOU.
Abusive marketing tactics, handing out misleading advertising or marketing materials not in accordance with DoD Instruction 1322.25 requirements, or distributing marketing materials at unapproved events or locations.

Conducting inappropriate recruitment activities (i.e., collection of individual name, phone number, email address, engage in same-day recruitment and registration, recruitment of newly assigned military personnel, or engage in open recruiting efforts).

Handing out promotional items having a monetary value of more than a “de minimis” amount (i.e., laptops, tablets, or mobile devices).
Discussion