

Voluntary Education Program Undersecretary of Defense (Personnel and Readiness)

DoD Institutional Compliance Program

June 2023



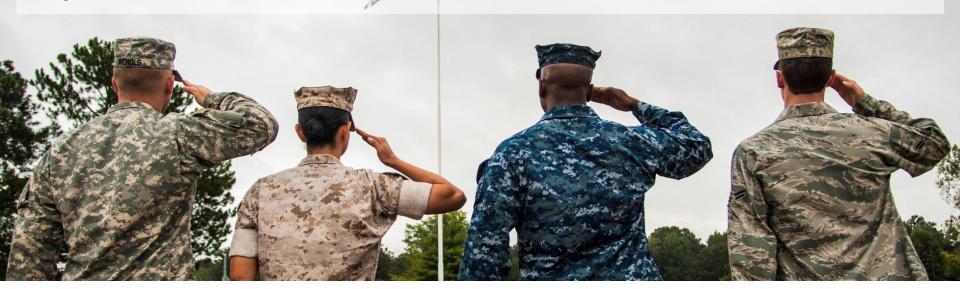
Agenda

- VolEd Mission
- Compliance vs. Non-Compliance
- Institutional Compliance Program (ICP) Overview
- Way Ahead
- Questions



VolEd Mission

- Promote quality educational opportunities for Service members
- Maintain strategic relationships with educational institutions to ensure Service member success
- Cultivate a culture of compliance to ensure Service members are protected





DoD VolEd at a Glance

- DoD spends ~ \$500M annually on TA for post-secondary education for Service members
- Benefit is used while <u>still</u> on Active Duty, after "normal working hours"
- Programs administered by each Service, with policy oversight by DoD's VolEd Office
- Used to fund all or part of postsecondary education pursuits
- Annual and lifetime caps defined by DoD and Service-specific policies
- In 2014, the GAO recommended the DoD develop and implement a "systematic, risk-based oversight approach"



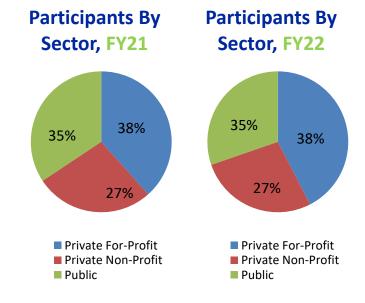
FY22 VolEd Review

(Sectors Receiving TA)

Sector	# Students	# Courses	TA Paid	Per Course
Private For Profit	52K	150K	118M	\$768
Private Non-Profit	36K	114K	84M	\$739
Public	48K	132K	90M	\$679
All Sectors	136K	399K	292M	\$730

Note: Amounts may not be exact due to rounding.

- All Educational Institutions Receiving TA:
 - TA users went to 1,324 different schools
 - 72% have 10 or fewer TA students
- Top 25 Educational Institutions by TA Students:
 - 79% of students attended
 - $-$ 82% of TA paid





VolEd Review

(Professional Counseling)

- The Military Services employ over 365 Education Services
 Specialists and 254 professional counselors worldwide (available in-person at a local education center or by phone).
- Last year DoD conducted over 1.7 Million professional counseling sessions to help Service members explore higher education options, discuss benefits, and consider financing.
- What are they discussing?
 - Access
 - Interests/Values
 - Career Pathways
 - Program Options
 - Academic Readiness

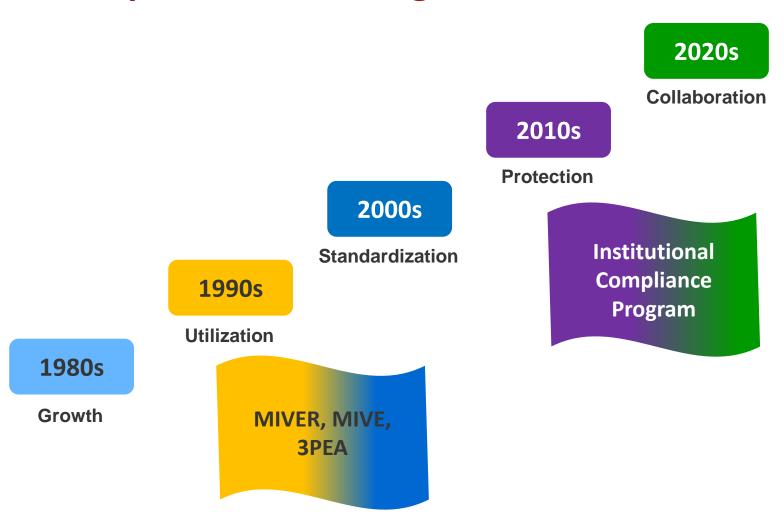
- Financing Options
- Time-to-completion
- Rigor
- Prior Learning Assessment
- Lifestyle/Income Expectations



1970s

Social Compact Begins

Compliance in the Big Picture





Compliance vs. Non-Compliance

By signing the MOU, it obligates your institution to take part in the compliance process when requested (Section 3.e of the DoD VolEd MOU). Your institution can choose to not participate in the compliance process, but this will necessitate initiation of a cancellation action of the MOU in accordance with Section 6(f).

Compliance:

- Obtaining and maintaining accreditation from an organization recognized by the Department of Education
- Obtaining and maintaining VA certification
- Providing compliance-related information upon request
- Addressing findings and providing evidence of remediation

Non-compliance:

- Losing accreditation or VA certification
- Not actively participating in ICP

Institutional Compliance Program (ICP) Overview

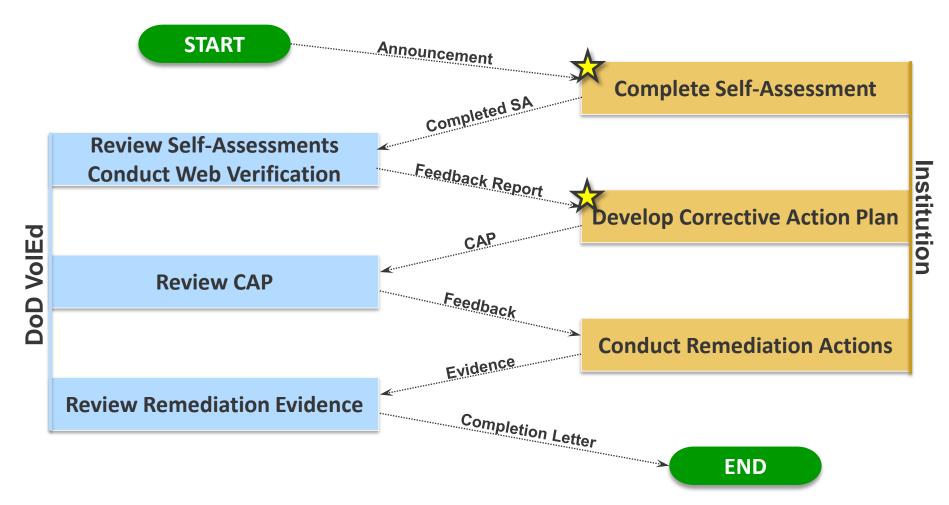


Selection Process

- Execute Risk-Factor Model to select 50 institutions
 - Utilizes previous years' execution data to examine all active institutions
 - Develops a rank order listing to identify institutions that could have a higher risk of non-compliant behaviors
- Select additional 200 institutions randomly, for a total of 250
- Apply business rules for exemptions for repeats
 - Successfully completing an assessment cycle makes an institution exempt from participation for 4 years
 - Most active institutions assessed every 5-7 years



The ICP Process





Compliance Assessments

- Assessment items underpinned by:
 - Title 10, US Code
 - Presidential Executive Order 13607
 - DoD Directives and Instructions
- Examine 4 main areas:
 - Recruiting, Marketing, and Advertising
 - Financial Matters
 - Accreditation
 - Post-Graduate Opportunities

Compliance Assessments ensure institutions are providing clear, accurate information to enable Service members to make informed decisions



Overall Trends 2017-2022

- 1,414 annual ICP assessments completed
- 10,560 findings reported and remediated
- Process remains relatively constant
 - All active institutions subject to a review every year
 - Minor adjustments to the Risk Factors
 - Assessment items unchanged
- Results consistent across all annual cycles
- Processes improving...cycle times getting shorter



CRM Tool/Portal

- VolEd's extensive stakeholder population generates a high volume of communications artifacts
 - Managing these artifacts became problematic
 - ICP communications exacerbated the problem
- VolEd team developed a baseline communications management tool leveraging the Salesforce platform
- Launched CRM Portal for Institutions' use as part of the 2022 annual assessment cycle
 - Cycle still ongoing, but feedback has been overwhelmingly positive
 - Repeating for 2023 cycle



Way Ahead

- Continue to improve overall ICP processes
 - Minimize workload burden on institutions
 - Enhance communications and collaboration
- Create better interfaces with MOU processes
 - Currently separate and distinct, need to be synchronized
- Update policies and directives to clarify roles and responsibilities across the enterprise

Questions?