Deemed Approved

October 2011

National Association of Veteran Program Administrators

Public Law 111-377

- Post 9/11 Veterans Educational Assistance Act of 2010
  - Significant changes to payment of benefits that will be addressed by VA
  - Section 203 deals specifically with approval of programs

Approval of Schools

- PL 111-377 decrees that degree programs offered at accredited public and private-not-for-profit schools are "***deemed approved"*** for VA education benefits.
  - VA has extended this definition to include non-degree programs offered at these institutions
  - VA will provide a procedures for deemed approved schools to provide updates to VA
- New accredited public and private-not-for-profit schools must be approved by the SAA before they subsequently become "deemed approved"
- NCDs and private-for-profit schools will be approved by the SAA. ***No changes to these approval procedures***
- SAA will take on a larger compliance

Standard College Degrees

- Public Law 111-377 deems the following programs as approved subject to the provisions of Section 3675:
  - “An accredited standard college degree program offered at a public or not-for-profit proprietary educational institution that is accredited by an agency or association recognized for that purpose by the Secretary of Education”
  - Addresses the approval of “programs” at schools not the approval of the school itself

Standard College Degrees

- Section 203 does not apply to the following programs:
  - Degree programs offered at proprietary for-profit IHLs
  - Non-standard college degree programs offered at a public or not-for-profit proprietary educational institutions
  - VA has extended deemed approved to these NCD programs
  - Programs offered at non-degree schools (NCDs)

Annual Approval Updates?

- **For those that are *not* deemed approved…**
- **Annual updates are *still* required – you should update your information on file with the SAA <u>whenever it changes</u>.**
  - For example: publish a new bulletin/catalog, adopt a new calendar, change of location, new or revised programs of education, etc…
  - Send the SAA 2 copies of all documents "certified true and correct as to content and policy". Must be signed by a high level school official.

Other Approval Criteria

- In addition to approving programs, SAAs also review other approval criteria as outlined in CFR 21.4253. Catalog review includes:
  - Graduation requirements
  - Standards of progress
  - Student conduct policy
  - Attendance standards
  - Prior Credit policy and procedures
  - Instructor qualifications & facilities

Notification Form

Compliance Surveys

- Section 203 allows that the Secretary of Veterans Affairs “may utilize the services of a State Approving Agency for such compliance and oversight purposes as the Secretary considers appropriate without regard to whether the Secretary or the agency approved the courses offered in the State concerned”

Compliance Surveys

- Effective October 1, 2011, SAAs will begin conducting compliance surveys for the United States Department of Veterans Affairs
- The number of surveys will expand dramatically during FY 12. Expect the following surveys
  - *ALL* active NCDs will be surveyed
  - *ALL* proprietary for profit schools will be surveyed
  - *ALL* schools with 300+ beneficiaries will be surveyed
  - 10% of all other schools will be surveyed

Compliance Surveys

- In order to facilitate a compliance survey, please have the following copies available when a compliance survey is conducted at your school:
  - Unofficial Copy of the student's transcript
  - Student's degree course checklist
  - Transfer credit evaluation form, if applicable
  - If class attendance is required, please provide attendance documentation
  - Your latest total enrollment figures, and your total veteran-student enrollment figures, broken down by Chapter such as Chapter 30, 1606, etc.

Compliance Surveys continued

- Continuing
  - Copies of financial records for students identified as Ch 33 recipients
  - Financial records may include copies of bills, charges, accounts receivable records, ledger cards, invoices, etc
  - The records required will be dependent upon the type of records that your school uses
  - We may not finish the survey on site and may need to take back copies of this information in order to complete the survey at our office

Compliance Surveys continued

- Conduct of Survey
  - We may conduct student interviews during the survey. Please provide a private office or conference room for our use.
  - We will conduct entrance and exit briefings with school staff. Insure you invite appropriate school staff to these briefings (including, but not limited to, financial aid, bursar, your supervisor, etc.)
  - We will provide you with an advance letter or email notifying you of the details of the survey. This will include a questionnaire that you should complete and provide to us during the entrance briefing.

Questions?