Principles of Excellence Panel

2015 Council of College and Military Educators
Professional Development Symposium
January 27, 2015
Meet Your Panelists

Dawn Bilodeau
Chief, DoD Voluntary Education Programs
Department of Defense (DoD)

Jon O’Bergh
Senior Policy Advisor
Department of Education (ED)

Patrick Campbell
Policy Analyst
Consumer Financial Protection Bureau (CFPB)

Robert Worley
Director, Education Service
Department of Veterans Affairs (VA)
On April 27, 2012, President Obama signed Executive Order (EO) 13607 directing agencies to implement and promote compliance with “Principles of Excellence” for educational institutions that interact with Veterans, Service members and their families.

The Principles of Excellence (PoE) will:
- Provide information about the financial cost and quality of educational institutions;
- Prevent abuse and deceptive recruiting practices; and
- Ensure that educational institutions provide high-quality academic and student support

Implementation is a joint effort between Departments of Education, Defense, Justice, Veterans Affairs, and Consumer Financial Protection Bureau.
Established guidelines for educational institutions receiving Federal funding, especially VA’s Post-9/11 GI Bill and DoD’s Tuition Assistance programs.

Requires institutions to provide information, support, and protections to Federal education beneficiaries.

Strengthens oversight, enforcement and accountability activities within educational benefit programs.

Expands student data collection efforts to better understand educational outcomes.

Requires development of a Centralized Complaint System for students.

Provide complaint data provided to the Federal Trade Commission's Consumer Sentinel.

Agencies share information:
- Complaint data.
- Reviews (i.e., third party, risk-based, program, compliance).
- Administrative actions and/or eligibility determinations.
Develop and publish student outcome measures for educational institutions serving Veterans, Servicemembers and their family members.

Interagency effort in support of Executive Order 13607.

These joint outcome measures include:
- Retention and Persistence Rates
- Course and Graduation/Program Completion Rates
- Number of Degrees/Certificate Completions
- More at http://nces.ed.gov/statprog/outcomemeasures

Departments planning to make initial outcome measures data available in 2015 on College Navigator and Department websites.

Closely watching President’s College Rating System initiative.
Department of Defense

Dawn Bilodeau
Chief, DoD Voluntary Education Programs
DoD Instruction 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 PoE.

Postsecondary Education Complaint System

- Military students (TA or MyCAA recipients)

Establish new uniform rules and strengthen existing procedures for access to military installations by education institutions.

Third Party Review – under construction.
DoD Quality Assurance

PRINCIPLES OF EXCELLENCE

ACCREDITATION, TITLE IV, VA APPROVAL, STATE AUTHORIZATION

MOU with Institutions

Interagency Coordination
DoD, VA, ED, CFPB, DOJ, FTC

Outside Third Party Review

Feedback System
What is it?
- Eight specific ways that colleges and universities can support veterans as they pursue their education and employment goals
  - Complements Principles of Excellence
  - Voluntary
- Developed jointly by Education, VA and Defense
- 1,375 IHEs have joined

How to join
- Submit a letter of affirmation on official letterhead signed by college president to 8 Keys registration site at Education
  - 8keys@ed.gov

What’s next?
- Community of practice for 8 Keys members
- Evidence-based practices resource
8 Keys to Veterans’ Success

1. **A culture of connectedness.** Create a culture of trust and connectedness across the campus community to promote well-being and success for veterans.

2. **Leadership support.** Ensure consistent and sustained support from campus leadership.

3. **Early alert system.** Implement an early alert system to ensure all veterans receive academic, career, and financial advice before challenges become overwhelming.

4. **Centralized space.** Coordinate and centralize campus efforts for all veterans, together with the creation of a designated space for them (even if limited in size).

5. **Local coordination.** Collaborate with local communities and organizations, including government agencies, to align and coordinate various services for veterans.

6. **Use of data.** Utilize a uniform set of data tools to collect and track information on veterans, including demographics, retention, and degree completion.

7. **Professional development.** Provide comprehensive professional development for faculty and staff on issues and challenges unique to veterans.

8. **Sustainability.** Develop systems that ensure sustainability of effective practices for veterans.
IHEs are expected to use the Shopping Sheet to provide the required personalized and standardized form with financial aid information for undergraduate and graduate service members, veterans, military spouses, and other military family members covered by EO 13607.

- **2,092 IHEs – 48% of undergraduates**
CFPB: Our mission
CFPB: Our Mission

Purpose: To make markets for consumer financial products and services work for Americans.

By: Ensuring that consumers get the information they need to make the financial decisions that are best for them. Working so that:

- prices are clear up front,
- risks are visible, and
- nothing is buried in fine print.
Office of Servicemember Affairs: Our mission
Office of Servicemember Affairs

OSA Mission: Address consumer financial challenges affecting military personnel (including retirees and veterans) and their families. By:

1. Providing financial education,

2. Monitoring complaints, and

3. Coordinating with other Federal and state agencies on military consumer protection measures.

Complaints are an important way we learn about financial challenges impacting the military.
The CFPB accepts complaints about:

- Mortgage
- Debt collection
- Credit reporting

- Bank account or service
- Credit card
- Money transfer

- Payday loan
- Student loan
- Vehicle or other consumer loan

Have a complaint about a product or service not on this list?

Call toll free (855)411-CFPB (2372), or TTY/TDD (855)-729-CFPB (2372), and we'll answer your questions and refer you to other resources that may help.

Visit [www.consumerfinance.gov/complaint](http://www.consumerfinance.gov/complaint) for more information.
Working together to protect student veterans

CFPB has signed an agreement with VA, DoD and ED to carry out a comprehensive strategy to strengthen our enforcement and compliance work.

Our interagency agreement requires the agencies to:

• Have a point of contact for sharing information
• Share complaints about schools
• Alert each other of suspected fraud, deception, or misleading practices; and/or
• Notify each other of any agency action that could lead to a college’s loss of eligibility, a suspension of enrollment, or a termination of license
Questions?

We want to hear from active duty, Guard, Reserve, retirees, family members, and veterans – the whole military community.

Those who serve, or have served, our country should not have to worry about falling victim to unfair or deceptive financial practices. It’s our honor to represent the military community at the CFPB, and to make sure that its concerns are heard – and that we do something about them.

Ways to connect:
• CFPB website:  www.consumerfinance.gov
• OSA Facebook page:  www.facebook.com/cfpbmilitary
• OSA Twitter feed:  www.twitter.com/cfpbmilitary
• Order CFPB brochures:  www.promotions.usa.gov/cfpbpubs.html

* All photos courtesy of the Department of Defense.
Principles of Excellence Update

Council of College and Military Educators

Robert M. Worley II
Director, Education Service

POST 9/11 GI BILL
It’s Your Future

benefits.va.gov/gibill
Overview

- Executive Order 13607
- Comparison Tool
- GI Bill® Feedback System
- GI Bill® Registered Trademark
- Veteran Outcome Measures
- PL 113-146 – Veterans Access, Choice and Accountability Act of 2014
  - Section 701
  - Section 702
Executive Order 13607

• Executive Order 13607: Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans, Spouses, and Other Family Members

• The Principles of Excellence (PoE) are established to strengthen oversight, enforcement, and accountability within the Department of Veterans Affairs’ (VA) Post-9/11 GI Bill and Department of Defense’s (DoD) Tuition Assistance Programs for educational institutions serving Veterans, Servicemembers, and dependents who receive funding from Federal veteran and military educational benefit programs

• PoE will:
  • Provide information about the financial cost and quality of educational institutions;
  • Prevent abuse and deceptive recruiting practices; and
  • Ensure that educational institutions provide high-quality academic and student support

• Implementation is a joint effort between Department of Veterans Affairs, Department of Defense, Department of Education, Consumer Financial Protection Bureau, and Department of Justice
GI Bill® Comparison Tool

**February 2014** – Initial release

- Streamlined information into an easy-to-use online tool
- Combined resources from more than 17 different web pages and three Federal Agencies
- The tool provided information to estimate Post-9/11 GI Bill® benefits and research approved facilities for:
  - Tuition/fees
  - Housing allowance
  - Veteran indicators, i.e. Yellow Ribbon and GI Bill
  - School indicators for graduation, loan default rates, and median borrowing amounts
  - Indicator whether school agreed to the Principles of Excellence

**August 2014** – Additional functionality released

- Included a more robust GI Bill benefit calculator
- Included additional information pertinent to the Veteran population:
  - Identified schools with student Veteran groups
  - VetSuccess on Campus
  - Schools who agreed to the 8 Keys to Success
GI Bill® Comparison Tool

November 2014 – Additional functionality released

- Advanced Search Option – Users will be able to search for schools by:
  - State
  - Institution Type – Public, Private or For-Profit
  - School Indicators – POE, Yellow Ribbon, 8 Keys to Success and Student Veteran Group
- Ability to compare up to three schools
- Displays new data elements
  - School Complaints
  - Accreditation Status
  - Total Paid to Schools for Yellow Ribbon and Tuition and Fees by Fiscal Year
- Include Remaining GI Bill Benefit Programs
  - Montgomery GI Bill – Chapter 30
  - Montgomery GI Bill Selected Reserve – Chapter 1606
  - Reserve Educational Assistance Program – Chapter 1607
  - Dependents Education Assistance Program – Chapter 35
  - Vocational Rehabilitation – Chapter 31
- As of January 12, 2015, over 581K unique visitors and nearly 932K schools researched

GI Bill® Comparison Tool Future Releases

We continue to work to add more capabilities in the future to:

• Enhance Print Functionality

• Include:
  • School Certifying Official Contact Information
  • Detailed Accreditation Information
  • Major/Program Type
  • In State Tuition Policies
  • Veteran Outcome Measures
  • Feedback Rating

The GI Bill® Comparison Tool supports the 2012 Presidential Executive Order and the Improving Transparency in Education for Veterans Act of 2012.

VBA welcomes feedback on the Comparison Tool and encourages all visitors to submit feedback by clicking on the ‘Feedback’ link located at the bottom of the tool’s page.

Prior to launching the Comparison tool, School Certifying Officials (SCOs) provided feedback on the data outputs.

**Feedback**

If you experience technical issues or have feedback on how we can improve the GI Bill Comparison Tool, please send us an email at 223D.VBACO@va.gov with “Comparison Tool” in the subject line. Base on your feedback, we will be making quarterly updates to the GI Bill Comparison Tool.

**Please note this email is only for website related issues**, all questions regarding GI Bill benefits should be directed to the “Ask a Question” section of our website.
## GI BILL COMPARISON TOOL DATA

<table>
<thead>
<tr>
<th>Data Reported</th>
<th>January 20, 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unique Visitors to Date</td>
<td>595,185</td>
</tr>
<tr>
<td>Researched Schools</td>
<td>958,249</td>
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</tbody>
</table>

### GI BILL COMPARISON TOOL: TOP U.S. SCHOOL SEARCHES

- American Public University
- Harvard
- University of Texas at Austin
- Arizona State University
- University of Washington
GI Bill® Feedback System Overview

- Launched on January 30, 2014
- Provides a mechanism for receiving, processing, and referring complaints about educational institutions within VA and to other federal agencies
- Empowers individuals to report their experiences with educational institutions
- Beneficiaries eligible for or receiving VA educational benefits may submit their experience on behalf of someone else, or anonymously
  - Fraud
  - Use of deceptive and misleading practices
  - Failing to follow the “Principles of Excellence”
- The Feedback System will be used by VA personnel (VACO, ELR’s, ECSS’s) and SAA personnel to track and manage cases submitted by individuals, coordinate with educational institutions, and provide feedback throughout the process with the complainant
The Feedback System is intended for complaints directly related to “Principles of Excellence”

These types of complaints should not involve or be concerned with the following:

- VA’s handing of education benefits, not the institution or employer
- Limitations imposed by law (i.e. break pay)
- VA policies
- VA claims processing
  - Entitlement
  - Eligibility
  - Payments
  - Debts

These are referred to VA’s Right Now Web or GI Bill Hotline
• Routine complaints are reviewed and sent to schools to resolve and provide a written response back to VA

• Complaints are shared with the complainant to measure their satisfaction with the resolution

• Egregious or flagrant complaints will be directed to the Regional Program Offices (RPOs) to conduct a targeted risk-based review

• Complaints are submitted to a central repository at Federal Trade Commission’s Consumer Sentinel Network where they are accessible by
  – Federal agencies
  – State agencies
  – Law enforcement
    • Department of Justice
    • Consumer Financial Protection Bureau
GI Bill® Feedback System and School Involvement

- Schools should adhere to the “Principles of Excellence” to provide high-quality student support and services for Veterans, Servicemembers and their eligible family members eligible for or receiving VA education benefits. Sign up for POE at principles.excellence@va.gov

- VA requests schools:
  - Review the complaint
  - Provide a response to the complainant, as soon as, possible but no later than within 60 days of this notice via email to PROCESS.VBAVACO@va.gov using the following guidelines:
    - Respond to the complainant
    - Use school letterhead
    - Respond with a proposed resolution
    - Reference the complaint case number
    - Forward to VA within 60 days of the message
GI Bill® Feedback Reporting Data

<table>
<thead>
<tr>
<th>FEEDBACK - REPORTING DATA</th>
<th></th>
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<tbody>
<tr>
<td>Data Reported</td>
<td>January 19, 2015</td>
</tr>
<tr>
<td>Landing-Page Views</td>
<td>36,894</td>
</tr>
<tr>
<td>Complaints Submitted</td>
<td>2,507</td>
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</table>

<table>
<thead>
<tr>
<th>FEEDBACK COMPLAINT ISSUES</th>
<th></th>
</tr>
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<tbody>
<tr>
<td>Financial Issues</td>
<td></td>
</tr>
<tr>
<td>Tuition and Fees</td>
<td></td>
</tr>
<tr>
<td>Quality of Education</td>
<td></td>
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</tbody>
</table>

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<tr>
<th>COMPLAINT DATA POSTED ON GI BILL® WEBSITE</th>
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On January 30, 2014, VA launched the Feedback System to intake student complaints about schools not complying with POE

- Total POE Complaints Received: 1,621 (65%)
  - Pending: 37 (2%)
  - Active: 1,101 (68%)
  - Completed: 485 (30%)
- Non-POE: 889 (35%)
- Risk-Based Reviews: 45
  - 1 Suspension
  - 6 Withdrawals

### Complaints by Issue

<table>
<thead>
<tr>
<th>Issue</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Financial Issues (e.g. Tuition/Fee charges)</td>
<td>885</td>
</tr>
<tr>
<td>Other</td>
<td>642</td>
</tr>
<tr>
<td>Quality of Education</td>
<td>419</td>
</tr>
<tr>
<td>Refund Issues</td>
<td>302</td>
</tr>
<tr>
<td>Recruiting/Marketing Practices</td>
<td>231</td>
</tr>
<tr>
<td>Accreditation</td>
<td>171</td>
</tr>
<tr>
<td>Grade Policy</td>
<td>160</td>
</tr>
<tr>
<td>Change in degree plan/requirements</td>
<td>159</td>
</tr>
<tr>
<td>Student Loans</td>
<td>134</td>
</tr>
<tr>
<td>Transfer of Credits</td>
<td>130</td>
</tr>
<tr>
<td>Release of Transcripts</td>
<td>108</td>
</tr>
<tr>
<td>Post-graduation Job Opportunities</td>
<td>80</td>
</tr>
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GI Bill® Registered Trademark

- GI Bill® is a Federally registered trademark owned by VA
- As part of the Principles of Excellence, VA trademarked the term to stop deceptive and misleading promotional efforts targeting GI Bill educational benefits

**Authorized to use the trademark**

- Education/training institutions eligible to receive GI Bill benefits
- State Approving Agencies
- Recognized Veterans Service Organizations
- Must use the trademark symbol in the most prominent place and give attribution (wording on [http://www.benefits.va.gov/gibill](http://www.benefits.va.gov/gibill) along with full instructions on Terms of Use)

**Third-party users**

- Cannot use the term in company names, internet domain names or logos
- Can only use the term to promote VA benefit programs
No one may

- Use the GI Bill trademark to imply a relationship, affiliation, or association with VA that does not exist
- Misrepresent VA services through use of the mark or by the use of confusingly similar wording

Enforcement

- Report suspected violations by email to GI-Bill.Trademark@va.gov

Potential violations under investigation

- Use of “GI Bill” without trademark symbol “®” in content on website; cease and desist letter sent to a 501(c)(3) non-profit corporation (Service2School) in December 2014

Resolved Issues

- One Facebook page (GI Bill Asia) removed due to trademark violations along with a letter from the Director sent to the owner in January 2015
Establishing Principles of Excellence, Department of Veterans Affairs (VA) is required to develop and publish Veteran student outcome measures for educational institutions serving Veterans, Servicemembers and their family members.

VA collaborated with Department of Education (ED) and Department of Defense (DoD) to develop and publish outcome measures that will provide information on available educational programs: [http://nces.ed.gov/statprog/outcomemeasures](http://nces.ed.gov/statprog/outcomemeasures)

The outcome measures data collected by VA will be made publicly available starting in early in 2015 on College Navigator and VA’s GI Bill® website.

December 23 & 24, 2014 - Letters sent to 2-year and 4-year institutions of higher learning to validate data. Requested response no later than **1 March 2015**

These joint outcome measures include:
- Retention and Persistence Rate
- Transfer-Out Rate
- Graduation/Program Completion Rate
- Degree/Certificate Completion Rate
- Number of Years to Complete Degree/Certificate
- Number of Institutions Attended to Complete Degree
VACAA Sections 701/702 Status

EDUCATION SERVICE UPDATE

POST 9/11 GI BILL
It’s Your Future

benefits.va.gov/gibill
Section 701 - Extends eligibility for Post-9/11 GI Bill benefits under Fry Scholarship to the spouses of active duty Servicemember’s who died in the line of duty

Section 701 – Progress

October 20, 2014 – Section 701 Choice Act announced via VA press release
October 22, 2014 – Deputy Under Secretary for Economic Opportunity sent mass email announcing this new benefit; began promoting via social media; fact sheet posted on GI Bill website
October 23, 2014 - VAF 22-5490 Dependents ‘ Application for VA Education Benefits - published on VA’s internet site
October 27, 2014 – Training on claims processing conducted for the Regional Processing Office employees
October 31, 2014 – Published training materials
November 3, 2014 – VBA-RPOs began accepting applications
November 5, 2014 – Letters to over 6,800 potential beneficiaries mailed
January 16, 2015 – Education Regional Processing Offices have received 528 applications
Section 702 - Requires VA to disapprove programs of education under the Post-9/11 GI Bill and Montgomery GI Bill – Active Duty at public institutions of higher learning if the school charges qualifying Veterans and dependents tuition and fees in excess of the rate for resident students for terms beginning after July 1st, 2015.

Section 702 – Progress

October 29, 2014 – USB sent letter and compliance guide to State Governors – To date, VA has received formal responses from two states (SD, NV) stating intent to comply

November 3, 2014 – Fact Sheet posted on GI Bill website. Deputy Under Secretary for Economic Opportunity sent mass email providing information on Section 702

November 28, 2014 – Requested response deadline from states

December 19, 2014 - VA Education Service began hosting weekly Choice Act webinars/conference calls. VA invites all identified state points of contacts/designees, state Veterans Directors, State Approving Agencies, and National Council of State Legislators

January 2, 2015 - To avoid disruption to Veterans, VA sent guidance to all schools to certify $0 tuition and fees for terms starting after 1 July 2015 until states become compliant
States’ Compliance Status as of January 21, 2015

- 1 Territory has not responded or contacted VA (VI)
- 32 States and the District of Columbia have formally replied to date, and indicated an intent to comply by July 1, 2015 (AL, AK, AZ, AR, DC, DE, GA, HI, IA, ID, KY, MA, MD, MN, MS, MT, NC, ND, NH, NJ, NV, NY, OH, OK, OR, SC, SD, TN, UT, VA, WA, WI, WV)
- 14 States and 2 Territories have contacted VA (either asking questions or requesting more time), but have not issued a formal response to all 3 questions in the letter (CA, CO, CT, FL, GU, IL, IN, KS, LA, ME, NM, PA, PR, RI, VT, WY)
- 3 States (MI, MO, NE) responded stating that the decision and changes will be made below the state level
- 1 State (TX) reported compliance with section 702 and was confirmed by Education Service and Office of General Counsel
Principles of Excellence Panel

Questions?