

UNITED STATES DEPARTMENT OF DEFENSE



Department of Defense Voluntary Education Program

The Keys to Compliance:
DoD Voluntary Education Partnership MOU

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Agenda

- ➡ Principles of Excellence
- ➡ DoDI 1322.25 Update
- ➡ DoD MOU #3
- ➡ Institution Requirements
- ➡ Agency Requirements
- ➡ Miscellaneous Requirements
- ➡ Hindrances to Approval
- ➡ Questions



Principles of Excellence

(Driving Additional Requirements)

- ➡ **EO 13607 established Principles of Excellence as guidelines for educational institutions receiving Federal funding.**
- ➡ **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.**





DoDI 1322.25/DoD MOU

(Overview)

- ➡ **DoD Instruction (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**
 - Proposed Rule published to Federal Register August 14, 2013 for a 45-day public comment period.
 - Final Rule published to Federal Register May 15, 2014.
 - Change 2 posted to DoD Issuances May 23, 2014.
 - Change 3 posted to DoD Issuances July 7, 2014.
- ➡ **DoD Voluntary Education Partnership MOU signing deadline September 5, 2014.**



DoDI 1322.25/DoD MOU

(New Provisions)

- **All educational institutions providing education programs through the DoD Tuition Assistance (TA) program:**
 - *Will provide meaningful information to students about the financial cost and attendance at an institution so military students can make informed decisions on where to attend school.*
 - Will not use unfair, deceptive, and abusive recruiting practices.
 - Will provide academic and student support services to service members and their families.
- **Implementation of the DoD Postsecondary Education Complaint System for service members, spouses, and adult family members to register student complaints.**
- **Implementation of rules to strengthen existing procedures for access to DoD installations by educational institutions.**



DoDI 1322.25/DoD MOU

(Participation Criteria)

► Eligibility criteria to participate in TA:

- Accredited by accrediting body recognized by ED
- *Certified to participate in Title IV*
- VA approved
- Comply with state authorization requirements
- Signed DoD Voluntary Education Partnership MOU



Over 100
Compliance
Items

► Additional requirements to participate in TA:

- Provide personalized form covering total cost of educational program, pre-enrollment program costs, student debt estimates, and financial aid options in advance of enrollment/registration.
- Accommodate absences due to service requirements.
- Receive approval of accrediting agency for new courses/programs before enrolling students.
- *Return an appropriate proportion of TA based upon when a student stops attending.*



DoD MOU #3

(Title IV Requirement)

- Are *certified to participate in federal student aid programs through the ED under Title IV* of the Higher Education Act of 1965. Title IV certification may be provisional so long as the educational institution maintains eligibility to participate in the Federal Direct Loan Program.
- Educational institutions with a current DoD Voluntary Education Partnership MOU will have 18 months following final rule publication in the Federal Register to initiate, verify application to, and successfully meet the Title IV requirement.
- New applicants will be required to meet the Title IV requirement before signing a DoD Voluntary Education Partnership MOU.



DoDI 1322.25/DoD MOU

(MOU Participating Institutions)

Participating	Institutions (as of 18 Jan 15)	Previous MOU	MOU #3	% of MOU #3
Signatories:	Parent Institution:	3,240	2,582	
	Sub-Campuses:	4,225	12,608	
SOC Members:		1,649	1,684	65%
Accreditation Type:	National:	886	464	18%
	Regional:	2,354	2,118	82%
School Type:	Public:	1,466	1,365	53 %
	Private For-Profit:	786	435	17 %
	Private Not-For-Profit:	988	782	30 %
Degrees Offered:	Career Training:	1,666	1,696	66%
	Associates:	2,026	1,678	65%
	Bachelor's:	1,630	1,417	55%
	Masters:	1,353	1,230	48%
Delivery Method:	Distance Learning:	2,272	2,032	79%
	Classroom:	3,164	2,538	99%
	Correspondence:	288	181	7 %



Institution Requirements

(Principles of Excellence Prescribed)

Require educational institutions to:	MOU #2	MOU #3
Provide students with an Education Plan.	X	
Provide students with a personalized, standardized form with costs, financial aid and outcome measures.		X
Inform students of the availability and eligibility Federal financial aid before arranging private student loans.	X	X
End fraudulent and aggressive recruitment on military installations.	X	X
Obtain approval of institution accrediting agency for new course or program offerings before enrolling students.		X
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.		X
Have a refund policy that is aligned with the refund of unearned student aid rules applicable to Federal student aid.		X
Designate a point of contact for academic and financial advising.	X	



Agency Requirements

(Principles of Excellence Prescribed)

Require agencies to:	STATUS
Identify outcome measures that will provide information on available educational programs to support informed decision making about educational choices.	Completed October 2013 (DoD, ED & VA)
Create an interagency Centralized Complaint System.	Completed January 2014 (DoD, ED & VA)
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.	Completed February 2014 (VA)
Establish procedures for targeted risk-based program reviews of institutions to ensure compliance with the principles.	Completed May 2014 (VA)
Establish new uniform rules and strengthen existing procedures for access to military installations by education institutions.	Completed July 2014 (DoD)



Agency Requirements

(Streamlined Comparison Tools)

- **Before enrolling a service member, provide each prospective military student with specific information to locate, explain, and properly use the following ED and CFPB tools:**
 - College Scorecard, <http://collegecost.ed.gov/scorecard>
 - The College Navigator, <http://nces.ed.gov/collegenavigator>
 - Financial Aid Shopping Sheet,
<http://www2.ed.gov/policy/highered/guid/aid-offer/index.html>
 - 'Paying for College' webpage,
<http://www.consumerfinance.gov/paying-for-college>



Agency Requirements

(Streamlined Comparison Tools)

Department of Education College Scorecard

College Affordability and Transparency Center
College Scorecard

San Diego State University
San Diego, CA
Primarily bachelor's degree granting
Undergraduate enrollment: 25,796

Costs

What does it typically cost to attend San Diego State University?

The average net price for undergraduate in-state students is \$8,527 per year. Net price is what undergraduate students pay after grants and scholarships (financial aid you don't have to pay back) are subtracted from the institution's cost of attendance.

The average net price has **decreased 11.6%** from 2007 to 2009.

Click here to see listings of changes in college costs.

Click here to go to the Net Price Calculator for a better estimate of what your costs would be.

Graduation Rate

What percentage of students graduate?

65.6% of full-time students received their bachelor's degree within 6 years and 6.3% transferred to another institution. Graduation rate data are based on undergraduate students who enrolled full-time and have never enrolled in college before. This may not represent all undergraduates that attend this institution.

Loan Default Rate

Are students able to repay their loans after they graduate?

3.8% of borrowers defaulted on their Federal student loans within three years of entering repayment.

Median Borrowing

What is the typical amount borrowed for a student's undergraduate study?

Families typically borrow \$15,098 in Federal loans for a student's undergraduate study. The Federal loan payment over 10 years for this amount is approximately \$179.50 per month. Your borrowing may be different.

To learn about loan repayment options, go to: <http://studentaid.ed.gov/repay-loans/understandloans>

Employment

What kinds of jobs do students have when they graduate?

The U.S. Department of Education is working to provide information about the average earnings of former undergraduate students at San Diego State University who borrowed Federal student loans. In the meantime, ask San Diego State University to tell you about how many of its graduates get jobs, what kinds of jobs they get, and how much those graduates typically earn.

Visit <http://www.mymostmove.org> to explore what potential careers a particular postsecondary program or major prepares you to enter. The site has information about current earnings and potential growth in those occupations.

Department of Education Financial Aid Shopping Sheet

University of the United States (UUS)
Student Name, Identifier

Costs in the 2013-14 year

Estimated Cost of Attendance \$ X,XXX /yr

Tuition and fees	\$ X,XXX
Housing and meals	X,XXX
Books and supplies	X,XXX
Transportation	X,XXX
Other educational costs	X,XXX

Grants and scholarships to pay for college

Total Grants and Scholarships (Gift Aid; no repayment needed) \$ X,XXX /yr

Grants from your school	\$ X,XXX
Federal Pell Grant	X,XXX
Grants from your state	X,XXX
Other scholarships you can use	X,XXX

What will you pay for college

Net Costs (Cost of attendance minus total grants and scholarships) \$ X,XXX /yr

Options to pay net costs

Work options

Work-Study (Federal, state, or institutional) \$ X,XXX

Loan options*

Federal Perkins Loans	\$ X,XXX
Federal Direct Subsidized Loan	X,XXX
Federal Direct Unsubsidized Loan	X,XXX

*Recommended amounts shown here. You may be eligible for a different amount. Contact your financial aid office.

Other options

Family Contribution (As calculated by the institution using information reported on the FAFSA or to your institution.) \$ X,XXX /yr

- Payment plan offered by the institution
- Military and/or National Service benefits
- Parent PLUS Loan
- Non-Federal private education loan

Customized information from UUS

Graduation Rate

Percentage of full-time students who graduate within 6 years

65.6%

Loan Default Rate

Percentage of borrowers entering repayment and defaulting on their loan

3.8%

Median Borrowing

Students at UUS typically borrow \$15,098 in Federal loans for their undergraduate study. The Federal loan payment over 10 years for this amount is approximately \$179.50 per month. Your borrowing may be different.

\$179.50 /mo

Repaying your loans

To learn about loan repayment choices and work out your Federal Loan monthly payment, go to <http://studentaid.ed.gov/repay-loans/understandloans>

For more information and next steps:

University of the United States (UUS)
Financial Aid Office
123 Main Street
Anytown, ST 12345
Telephone: (123) 456-7890
E-mail: financialaid@uus.edu



Agency Requirements

(Streamlined Comparison Tools)

Department of Education College Navigator

Consumer Financial Protection Bureau 'Paying for College'



COLLEGE Navigator

Name of School
Type name of school here

States (use map for more than 1 state)
☒ No Preference
☐ Alabama
☐ Alaska

ZIP Code Miles from

Programs/Majors
0 items Selected

Level of Award
☐ Certificate
☐ Bachelor's
☐ Associate's
☐ Advanced

Institution Type
☐ Public
☐ Private non-profit
☐ Private for-profit
☐ 4-year
☐ 2-year
☐ <2-year

MORE SEARCH OPTIONS

[Show Results](#)

[Guide Me](#) [Clear Search](#)

Find the right college for you



- Refine your search with [More Search Options](#) to select additional search criteria.
- Build a list of schools using [My Favorites](#) for side-by-side comparisons.
- Pinpoint school locations with an [interactive map](#).
- Export search results into a [spreadsheet](#).
- Save your session including search options and favorites.
- [Add College Navigator](#) to your browser search bar.

College Affordability and Transparency Center

Browse lists of institutions with the highest and lowest tuition & fees and net price. [GO](#)

ADDITIONAL RESOURCES

Preparing for your Education
Find out what you need to do to prepare for education beyond high school. [GO](#)

Financial Aid
Apply for Federal Student Aid on FAFSA. [GO](#)

Postsecondary Education Outcome Measures: ED, DOD, and VA
ED, DOD, and VA have identified a set of potential education outcome measures for Veterans and service members. [GO](#)

Careers
Deciding on a career? Consult the [BLS.gov Occupational Outlook Handbook](#). [GO](#)



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Three steps that can help you get the right loan for you.

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MANAGE YOUR COLLEGE MONEY

Practical advice on how to make sure you're getting the best deal.

[Get started](#)

Repay student debt

Paying off student debt can be confusing. We'll walk you through how to optimize paying off your student loans, even if you're behind.

[Get started](#)



Agency Requirements

(Separate CCME Briefs)

- ➡ **Postsecondary Education Complaint System**
- ➡ **DoD Installation Access and Commercial Solicitation**
- ➡ **Technical education and C&L**
- ➡ **Data collection and reporting**



Miscellaneous Requirements

(Detailed in Backup)

- **TA Covered Charges**
- **Benefit Duplication**
- **Unfair, Deceptive, & Abusive**
- **Transparency**



Hindrances to Approval

(Current, Common Bumps in the Road)

➡ Flat-Rate Pricing

- Excellent model for State systems and predominantly full-time students
- Problematic for part-time, remote, course-at-a-time students

➡ Litmus Tests

- Can we clearly explain to a student what the costs will be?
- Will two military students in the same class pay the same rate?
- Could a dropped course affect either of the first two tests?



Hindrances to Approval

(Current, Common Bumps in the Road)

- **Return of Unearned TA**
 - POE says policy must mirror Title IV
 - Institutions often have two policies (institutional and Title IV). TA return policy must mirror the Title IV policy.
 - As current tuition rate sheets begin to expire, updates will require that institutions include their return policy.
 - Automated database rate submissions should have soft launch in late spring (optional), with mandatory use of database population by fall term.

UNITED STATES DEPARTMENT OF DEFENSE



Questions?

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Miscellaneous Requirements

(TA Covered Charges)

- Covered charges include those that are submitted to the military service by the educational institution for tuition only.
- Educational institutions that bundle tuition, fees, or books into a consolidated cost must detail the charges of fees and books separately for service members participating in the TA program.
- Fees include any charge not directly related to course instruction including but not limited to costs associated with room, board, distance learning, equipment, supplies, books/materials, exams, insurance, parking, transportation, admissions, registration, or fines.
- TA funds are not to be used for the purchase of books to include textbooks, ebooks, CDs/DVDs, or reference or instructional materials and fees.
- Institutional education revenue generated from military TA funds cannot be used to support textbook grants or scholarships.



Miscellaneous Requirements

(Benefit Duplication)

- **TA will not be authorized for any course for which a service member receives reimbursement in whole or in part from any other federal source such as veterans' education benefits when the payment would constitute a duplication of benefits paid to that educational institution. This includes:**
 - **GI Bill and other programs**
 - **Service-funded programs such as ROTC scholarship, education-related incentive or bonus, and advanced civil schooling**
- **Federal student aid loan, grant, and work-study programs will not be considered a duplication of benefit.**



Miscellaneous Requirements

(Unfair, Deceptive, & Abusive)

- **Ban inducements ... other than salaries paid to employees or fees paid to contractors in conformity with all applicable laws for the purpose of securing enrollments of service members or obtaining access to TA funds. Educational institution sponsored scholarships or grants and tuition reductions available to military students are permissible.**
- **Refrain from providing any commission, bonus, or other incentive payment based directly or indirectly on securing enrollments or federal financial aid (including TA funds) to any persons or entities engaged in any student recruiting, admission activities, or making decisions regarding the award of student financial assistance.**
- **Refrain from high-pressure recruitment tactics such as making multiple unsolicited contacts (three or more), including contacts by phone, email, or in-person, and engaging in same-day recruitment and registration for the purpose of securing service member enrollments.**



Miscellaneous Requirements

(Transparency)

- ➡ **Disclose transfer credit policies and articulated credit transfer agreements before a service member's enrollment.**
- ➡ **Disclosure will explain acceptance of credits in transfer is determined by the educational institution to which the student wishes to transfer and refrain from making unsubstantiated representations to students about acceptance of credits in transfer by another institution.**
- ➡ **Degree requirements and evaluated educational plans will meet educational requirements for credentialing in stated career field and graduates of a program will be eligible for relevant professional license or certification.**
- ➡ **Educational institutions will disclose any conditions (state or agency limitations) or additional requirements (training, experience, or exams) required to obtain relevant credentials.**



Miscellaneous Requirements

(Return of Unearned TA)

- Return any TA Program funds directly to the military service, not to the service member.
- Up to the start date, return all (100 percent) TA funds to the appropriate military service when the service member does not:
 - begin attendance at the institution or
 - start a course, regardless of whether the student starts other courses
- Return any TA funds paid for a course that is cancelled by the educational institution.
- Have an institutional policy that returns any unearned TA funds on a proportional basis through at least the 60 percent portion of the period for which the funds were provided.
- Educational institution will work with service members that stop attending due to a military service obligation to identify solutions that will not result in a student debt for the returned portion.