Department of Defense Memorandum of Understanding and the Implementation of the Principles of Excellence (EO 13607)

Carolyn Baker
Chief Voluntary Education Programs
DoD Policy

DoD Instruction (DODI) 1322.25
Voluntary Education Programs
March 15, 2011

- The DoDI establishes Voluntary Education policy
- States institution eligibility criteria for tuition assistance (TA)
- Requires a signed memorandum of understanding (MOU) with DoD by an educational institution providing educational programs through the DoD TA program
- DoDI 1322.25, Encl 3, 1.o. “To receive TA the institutions home campus must be a signatory of the DoD Voluntary Education Partnership MOU and the MOU must be posted on the DoD website.”
DoD MOU UPDATE

✓ January 13, 2012 Met with Key Stakeholders
  ▪ Health Education Labor and Pensions Committee Staff members
  ▪ National Association of Independent Colleges and Universities (NAICU)
  ▪ American Council on Education (ACE)
  ▪ American Association of Collegiate Registrars and Admission Officers (AACRAO)
  ▪ Association of American Universities (AAU)
  ▪ Association of Public and Land-grant Universities (APLU)
  ▪ National Association for College Admission Counseling (NACACNET)
  ▪ Consumer Financial Protection Bureau (CFPB)
  ▪ Vietnam Veterans of America (VVA)
  ▪ Veterans of Foreign Wars (VFW)
  ▪ Iraq and Afghanistan Veterans (IAVA)
  ▪ Vets Blue Star Families--support for military families (by military families for military families)
  ▪ Institutes for College Access and Success (TICAS)

Stakeholders provided recommendations and verbiage
Key Stakeholders Concerns

Institutions

3.d. (2) Recognize, accept, and award military training and education credit where appropriate, from the Army/ACE Registry Transcript System IHE
4. c. Educational Plan (1) Institutions will provide an evaluated educational plan to the Service member and his or her Service

Military and Veteran’s Organizations

• Aggressive marketing and loan defaults
• Skills required for employment
• Schools meeting Service members and Veteran’s special needs

Health Education Labor and Pension (HELP) Committee

• Ensuring quality – Service members and Veteran’s are receiving an education that will lead them to employment, certification and licensure
• Disclosure of information
• Aggressive marketing and loan defaults
Highlight of Changed MOU Requirements

**Servicemembers Opportunity College Member (SOC)**

Adhere to the SOC Consortium Principles, Criteria

Adhere to the Military Student Bill of Rights

Have a processes to determine credit awards and learning acquired for specialized military training and occupational experience when applicable

Recognize and use the ACE Guide to the Evaluation of Educational Experiences in the Armed Services

**Non-SOC Member***

Disclose its transfer credit policies prior to enrollment

Disclose its policies regarding award of academic credit for prior learning experiences

Disclose any academic residency requirements

Disclose institution's programs and costs, including tuition, fees, and other charges

Provide access to an institutional financial aid advisor

Prior to enrollment, provide information on institutional “drop/add,” withdrawal, and readmission policies and with potential impact of military duties

Conduct academic screening / competency testing; make placement based on student readiness.

Designate POC to provide appropriate academic and financial aid counseling and student support services

Policy in place banning recruitment inducements

Refrain from high-pressure recruitment tactics / incentive based directly or indirectly on securing enrollments or Federal financial aid (to include TA)

*All of the non-SOC member requirements are included the SOC Principles and Criteria and the Bill of Rights*
DOD MOU – Current Status

✓ All staffing internal to DoD has been completed

• DoDI 1322.25 is currently at OMB to be posted on the Federal Register

• 60 days after posting all schools must be a signatory of the DoD MOU and their name posted on the DoD MOU website: http://www.dodmou.com/

NO MILITARY STUDENT WILL BE DENIED TA BECAUSE A SCHOOL HAS NOT SIGNED THE MOU UNTIL IMPLEMENTATION OF POLICY AS DIRECTED BY OSD

NO SCHOOL SHOULD BE DENIED ACCESS TO A MILITARY BASE BECAUSE THEY HAVE NOT SIGNED THE MOU UNTIL IMPLEMENTATION OF THE POLICY AS DIRECTED BY OSD
Presidents Executive Order 13607
signed April 27, 2012

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

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

• Establishes Principles of Excellence as guidelines for educational institutions receiving Federal funding

• Expands student data collection efforts to better understand educational outcomes

• Requires development of a Centralized Complaint System for students
DoD Focus - PEO Requirements

DoD Requirements:
1. Require Schools to:
   a. Provide Students with an Education Plan
   b. Provide students with a personalized, standardized form with costs, financial aid and outcome measures
   c. Inform students of the availability and eligibility Federal financial aid before arranging private student loans
   d. End fraudulent and unduly recruitment on military installations
   e. Obtain approval of institution accrediting agency for new course or program offerings before enrolling students
   f. 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
   g. Have a refund policy that is aligned with the refund of unearned student aid rules applicable to Federal student aid
   h. Designate a point of contact for academic and financial advising
2. Provide military students, prior to using their benefits, streamlined tools to compare educational institutions using key measures for affordability and value through the VA’s eBenifits portal
3. Create an interagency Centralized Complaint System
4. Establish new uniform rules and strengthen existing procedures for access to military installations by education institutions
5. Establish procedures for targeted risk-based program reviews of institutions to ensure compliance with the principles

Currently in the MOU to be released:
• Full requirement 1. a, c, d, h.
• Partial requirement: 1. g.

What needs to be included/additional verbiage in the MOU: 1. b, e, f, g.

Tasks to be performed: 2, 3, 4, and 5.
g. Have a refund policy that is aligned with the refund of unearned student aid rules applicable to Federal student aid

*DoD will be implementing:*

20 USC 1098cc – Tuition refunds or credits for members of armed forces

Sec. 1098cc. Tuition refunds or credits for members of armed forces

*AND*

Title 34: Education
Part 668 – Student Assistance General Provisions
Subpart B – Standard for Participation in Title IV, HEA Programs
§ 668.22 Treatment of title IV funds when a student withdraws.
f. 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

DoD will be implementing:

Department of Education 34 CFR 668.18 - Readmission requirements for Service members

(a) General. (1) An institution may not deny readmission to a person who is a member of, applies to be a member of, performs, has performed, applies to perform, or has an obligation to perform, service in the uniformed services on the basis of that membership, application for membership, performance of service, application for service, or obligation to perform service.

(2) (i) An institution must promptly readmit to the institution a person described in paragraph (a)(1) of this section with the same academic status as the student had when the student last attended the institution...

(iv) (A) If the institution determines that the student is not prepared to resume...
b. Provide students with a personalized, standardized form with costs, financial aid and outcome measures

DoD will recommend schools use:

Commitment to use the Financial Aid Shopping Sheet

Department of Education
DCL GEN-ID 12-17
Publication Date: August 30, 2012
3. Create an interagency Centralized Complaint System

DoD, Department of Justice, Consumer Financial Protection Bureau, Department of Education and Veterans Affairs are creating a centralized school complaint system.

The system will:
- Receive school complaints/concerns from all Agencies
- Process complaints
- Refer matters for civil or criminal enforcement

The pilot system will be operational spring of 2013.
4. Establish new uniform rules and strengthen existing procedures for access to military installations by education institutions

**DoD is implementing the following policies spring of 2013**

- Institutions may access military bases to provide education, guidance, and training opportunities ONLY

- Marketing firms or companies that own and operate higher-learning institutions will not have access to the bases

- May access to military bases to provide education guidance to their students:

  Access *only* through the base education officer via a written proposal
  (a) Have a signed MOU with DoD;
  (b) Be chartered or licensed by the State government in which the services will be rendered;
  (c) Be State approved for the use of veteran’s education benefits;
  (d) Course offering must be provided by postsecondary institution accredited by a national or regional accrediting body recognized by the U.S. Department of Education; and
  (e) Have an on base student population of at least 20 active duty military students
ESOs will:

 ✓ Fully consider requests from **ALL types of** institutions complying with DoDI requirements

 ✓ Be consistent in treatment of **ALL types of** institutions

 ✓ Must maintain copies of all correspondence to include acceptance and denials

**The installation commander:**

or delegated authority, will grant final approval and have the authority to deny, suspend, or withdraw permission from an **ALL types of** institutions as deemed **appropriate and fairly**.
http://www.dodmou.com/
Until all PEO requirements are in place
DoD will continue to use...
DoD

Third Party Education Assessment

Assessment is contracted and managed by DANTES

Contractor: Management and Training Consultants, Inc. Dumfries, Virginia

http://www.mtci.us/third-party-assessments.html
## Third Party Education Assessments - FY12

<table>
<thead>
<tr>
<th>DATE</th>
<th>MILITARY SERVICE</th>
<th>INSTALLATION</th>
<th>SCHOOLS OPERATING ON THE INSTALLATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td>Air Force</td>
<td>Altus Air Force Base, Oklahoma</td>
<td>Embry-Riddle&lt;br&gt;Wayland Baptist&lt;br&gt;Western Oklahoma State University</td>
</tr>
<tr>
<td>✓</td>
<td>Navy</td>
<td>Naval Station Great Lakes, Illinois</td>
<td>College of Lake County&lt;br&gt;Columbia College&lt;br&gt;Southern Illinois University at Carbondale&lt;br&gt;Webster University</td>
</tr>
<tr>
<td>✓</td>
<td>Marines</td>
<td>MCAS Beaufort &amp; MCRD Parris Island&lt;br&gt;South Carolina</td>
<td>Embry-Riddle&lt;br&gt;Park University&lt;br&gt;Technical College of Lowcountry&lt;br&gt;University of Phoenix&lt;br&gt;University of South Carolina&lt;br&gt;Webster University</td>
</tr>
<tr>
<td>✓</td>
<td>Army</td>
<td>Fort Benning, Georgia</td>
<td>Central Texas College&lt;br&gt;Chattahoochee Valley Community College&lt;br&gt;Columbus State University&lt;br&gt;Columbus Technical College&lt;br&gt;Georgia Military College&lt;br&gt;Troy University&lt;br&gt;Vincennes University</td>
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</tbody>
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### Distance Learning Schools
- Grantham University
- American Military University

### Off Installation Schools
- Ashford University
- Liberty University
- Kaplan University
- DeVry University

= Assessment Completed
## Third Party Education Assessments - FY13

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<thead>
<tr>
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<th>INSTALLATION</th>
<th>SCHOOLS OPERATING ON THE INSTALLATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>TBD</td>
<td>Air Force</td>
<td>Joint Base Andrews, MD</td>
<td>Central Michigan, Embry Riddle Aeronautical University, Prince George Community College, University of Maryland University College, Webster University</td>
</tr>
<tr>
<td>TBD</td>
<td>Navy</td>
<td>Naval Base San Diego and Naval Base Coronado, CA</td>
<td>Central Texas College, Columbia College of Missouri, National University, San Diego Community College, St. Leo University, Southern Illinois University, Embry Riddle, Southwestern College, Vincennes</td>
</tr>
<tr>
<td>TBD</td>
<td>Marines</td>
<td>MCB Camp Lejeune, NC</td>
<td>Boston University, Campbell University, Craven Community College, Coastal Carolina Community College, Southern Illinois University, University of North Carolina Wilmington, Webster University, Fayetteville State University, University of Phoenix</td>
</tr>
<tr>
<td>TBD</td>
<td>Army</td>
<td>Fort Bragg, NC</td>
<td>Campbell University, Embry-Riddle Aeronautical University, Excelsior College, Fayetteville State University, Fayetteville Technical Community College, Methodist University, University of North Carolina-Pembroke, Webster University</td>
</tr>
</tbody>
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### DISTANCE LEARNING SCHOOLS

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<thead>
<tr>
<th>DISTANCE LEARNING SCHOOLS</th>
<th>OFF INSTALLATION SCHOOLS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trident University International, Cypress, CA</td>
<td>Excelsior College, Albany, NY</td>
</tr>
<tr>
<td>Columbia Southern University, Orange Beach, AL</td>
<td>Strayer University, Herndon, VA</td>
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<tr>
<td>Caldwell College, Caldwell, NJ</td>
<td>Williston State College, Williston, ND</td>
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Register Voluntary Education Concerns

Feedback From:
- Servicemembers
- Education Services Officers and Counselors
- Institutions

Visibility of all complaints/concerns:
- All concerns will be reviewed and followed up for corrective actions.
- The data will be provided to the Service on a reoccurring basis or immediately, depending on the severity of the complaint(s).

http://apps.mhf.dod.mil/voled
via email
voledconcerns@navy.mil

http://www.dodmou.com
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