

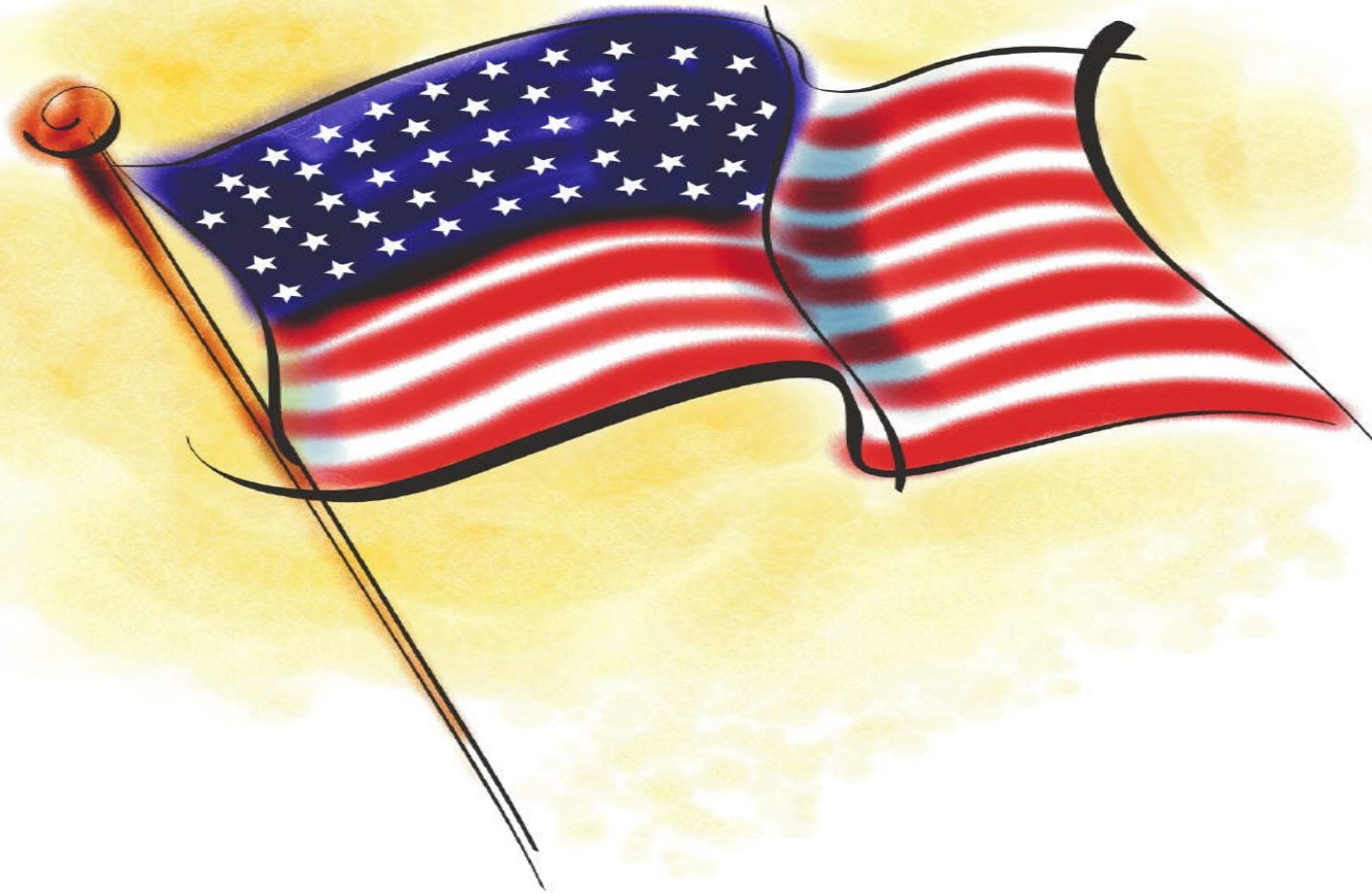
**South Carolina**  
Commission on Higher Education  
*Access | Affordability | Excellence*

November 7, 2024

State Approving Agency

Updates

# “Protecting the GI Bill®”



# State Approving Agency(SAA) Introduction

- South Carolina Commission on Higher Education State Approving Agency's (SAA), overview in accordance with the FY25 Department of Veterans Affairs Cooperative Agreement.



# State Approving Agency Introduction-Continues

- The South Carolina Commission on Higher Education Veterans' Education and Training Section is designated as the SAA by the Governor.
- The SAA is a part of the National Association of State Approving Agencies (NASAA), which is comprised of state agencies that have responsibility for the approval and training available through the GI Bill. The SAA acts on behalf of the federal government to evaluate educational/vocational institutions and training establishments.



# State Approving Agency Introduction-Continues

- In accordance with Title 38 Code of Federal Regulations (CFR), 21.4251, 21.4252, 21.4253, 21.4254, 21.4261, 21.4262, 21.4263, 21.4266, 21.4267, 21.4268 and 21.5230, the South Carolina SAA is responsible for reviewing, approving, disapproving and monitoring all education programs (colleges, universities, schools, apprenticeship and on-the-job training establishments), within the state of South Carolina.
- Moreover, in cooperation with the Department of Veterans Affairs (VA), the SAA assist veterans and those eligible with school/employment programs and GI Bill® benefit information. The SAA also conducts Risk-Base & Targeted Risk-Base Surveys at educational institutions.
- The SAA also conducts Supervisory Visits at educational institutions and training establishments to ensure financial and enrollment certifications are met in accordance with the approval requirements.



# Department of Veterans Affairs and the State Approving

- The Department of Veterans Affairs (VA) is responsible for all payment to veterans and those eligible to receive GI Bill® Education benefit program.
- The VA and SAA work together to ensure that the integrity of the GI Bill® is protected and not compromised by education pirates.





# SAA Regional Assignments



# Educational & Training Establishments

## Institution Terminologies:

- Institutions of higher learning (IHL) - colleges and universities that offers post-secondary degree(s)
- Non-college degree (NCD) - schools that offers post-secondary diplomas and certificates
- Apprenticeship (APP) - on-the-job training programs that are supervised by qualified employers that ranges from six (6) months and up to five years (5) in training time.
- On-the-Job-Training (OJT) - programs that are supervised by qualified employers that ranges from six (6) months and up to two (2) years in training time.



# Title 38 Code of Federal Regulations

## Terminologies:

- CFR-21.4251 - Minimum operating period
- CFR-21.4252 - Erroneous, deceptive, or misleading practices
- CFR-21.4253 - US-Department of Education - ([recognized accredited institutions](#))
- CFR-21.4254 - Unaccredited institutions
- CFR-21.4261 - Registered and unregistered-apprentice training establishments
- CFR-21.4262 - On-the-job-training establishments
- CFR-21.4263 - Flight schools
- CFR-21.4265 - Practical training
- CFR-21.4266 - Branch and extension campus
- CFR-21.4267 - Independent/distance learning
- CFR-21.4268 - Licensing & certification tests



# Department of Veterans Affairs

## School Certifying Official (SCO) Responsibilities

- VA and SAA point of contact.
- The SCO is the educational institution representative for the GI Bill® Education program being successful or unsuccessful.
- Submit program inquiries to the SAA.
  - Request for new program approval.
  - Request for program revision.
  - Request for program deletion.
  - Request for branch or extension site.
- School Certifying Official Handbook (On-line) (va.gov)



# Legislative Update

- **Isakson and Roe Veterans Health Care and Benefits Improvement Act of 2020**
- On January 5, 2021, the President signed the Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020 (P.L.116-315) into law. This new law brings significant changes to Veterans' education benefits. Many of the changes enhance or expand education benefits for Veterans, Service members, families and survivors and provide for the improvement and/or expansion of various GI Bill® programs.



# Legislative Update

## Isakson and Roe Veterans Health Care and Benefits Improvement Act of 2020

- **Section 1010. Dual Certifications.** Many schools use a practice of submitting initial enrollment certification with \$0.00 in the tuition and fees fields. After the drop-add period, the tuition and fees are certified by amending the term to add the tuition and fees amount. This is called **dual certification**. If the amended (tuition and fees only) certification is submitted within the time limits explained above, this will meet the two (2) certification requirement.
- **Section 1015.** Additional requirement for approval of educational institutions for purposes of the educational assistance programs of the Department of Veterans Affairs This section requires accredited institutions (even those “deemed approved”) to be eligible for participation in the Federal Student Aid program through Title IV of the Higher Education Act in order to be eligible to receive GI Bill® funds.  
Effective: August 1, 2021.



# Legislative Update

## Isakson and Roe Veterans Health Care and Benefits Improvement Act of 2020

- **Section 1017.** Grounds for disapproval of a course for purposes of the educational assistance programs This section allows for a course to be disapproved for GI Bill® enrollments if the institution does not comply with a risk-based survey by an SAA. Effective: August 1, 2021.
- **Section 1018.** Requirements for educational institutions participating in the educational assistance programs of the Department of Veterans Affairs This section essentially codifies in statute the requirements of the Principles of Excellence Program, currently in Executive Order 13607. It also makes compliance with those requirements mandatory for approval of a course of education. Effective: June 15, 2021, and apply to educational institutions beginning on August 1, 2021.
- **Section 1018.** Requirements for educational institutions participating in the educational assistance programs of the Department of Veterans Affairs This section essentially codifies in statute the requirements of the Principles of Excellence Program, currently in Executive Order 13607. It also makes compliance with those requirements mandatory for approval of a course of education. Effective: June 15, 2021, and apply to educational institutions beginning on August 1, 2021.



# Title 38 USC-3679(e)-School Compliance Form- VA Pending Payment

Browser tabs: Breannah Hend..., NASAA Profes..., DRAFT ELR Jo..., Wando HS Stu..., 7\_Catalog Qau..., 10\_Catalog Ap..., ☆ 8\_Title 38 USC-3679(e)... x

Tools: All tools Edit Convert E-Sign Find text or tools

### Title 38 United States Code Section 3679(e) School Compliance Form

Date: \_\_\_\_\_

Name of Institution: \_\_\_\_\_ FAC: \_\_\_\_\_

Address of Institution: \_\_\_\_\_  
Street City State Zip

Name of Contact: \_\_\_\_\_ Title: \_\_\_\_\_

Voice: \_\_\_\_\_ Fax: \_\_\_\_\_ E-Mail: \_\_\_\_\_

As part of the Veterans Benefits and Transition Act of 2018, section 3679(e) of Title 38, United States Code was amended. Educational Institutions are required to sign this compliance form to confirm your compliance with the requirements as outlined.

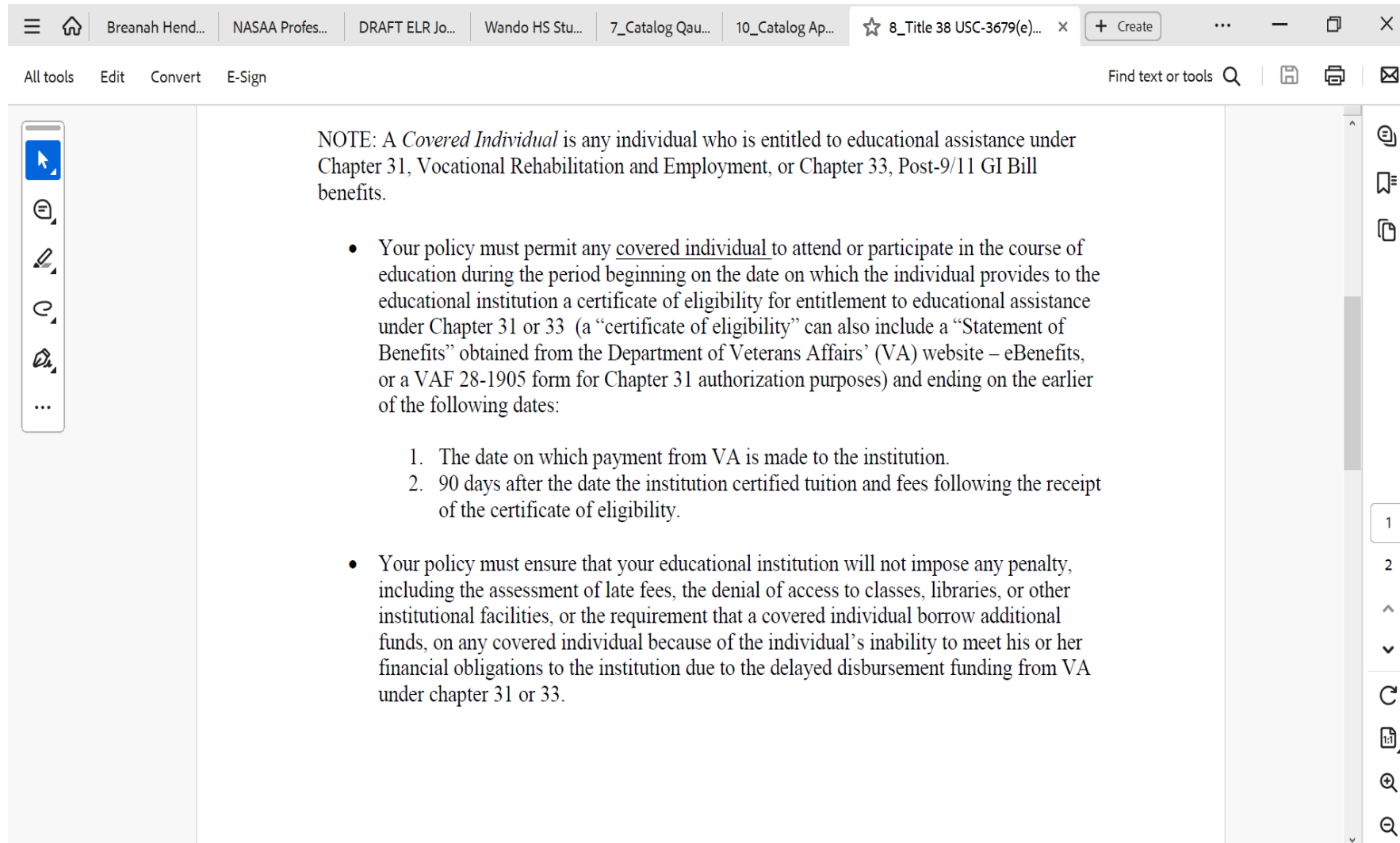
Effective August 1, 2019 the State Approving Agency, or the Secretary when acting in the role of the State Approving Agency, shall disapprove a course of education provided by an educational institution that has in effect a policy that is inconsistent with the areas below:

NOTE: A *Covered Individual* is any individual who is entitled to educational assistance under Chapter 31, Vocational Rehabilitation and Employment, or Chapter 33, Post-9/11 GI Bill benefits.

- Your policy must permit any covered individual to attend or participate in the course of




# Title 38 USC-3679(e)-School Compliance Form- VA Pending Payment



The image is a screenshot of a PDF document viewer. The browser's address bar shows the document title as "8\_Title 38 USC-3679(e)...". The viewer's toolbar includes options for "All tools", "Edit", "Convert", and "E-Sign". On the right side, there are icons for "Find text or tools", "Save", "Print", and "Share". The document content includes a note and a list of requirements.

NOTE: A *Covered Individual* is any individual who is entitled to educational assistance under Chapter 31, Vocational Rehabilitation and Employment, or Chapter 33, Post-9/11 GI Bill benefits.

- Your policy must permit any covered individual to attend or participate in the course of education during the period beginning on the date on which the individual provides to the educational institution a certificate of eligibility for entitlement to educational assistance under Chapter 31 or 33 (a “certificate of eligibility” can also include a “Statement of Benefits” obtained from the Department of Veterans Affairs’ (VA) website – eBenefits, or a VAF 28-1905 form for Chapter 31 authorization purposes) and ending on the earlier of the following dates:
  1. The date on which payment from VA is made to the institution.
  2. 90 days after the date the institution certified tuition and fees following the receipt of the certificate of eligibility.
- Your policy must ensure that your educational institution will not impose any penalty, including the assessment of late fees, the denial of access to classes, libraries, or other institutional facilities, or the requirement that a covered individual borrow additional funds, on any covered individual because of the individual’s inability to meet his or her financial obligations to the institution due to the delayed disbursement funding from VA under chapter 31 or 33.



# Legislative Update

## PUB.L. 117-328-December 29, 2022

- SEC. 216 Establishment of protections for a member of the armed forces who leaves a course of education, paid for with certain educational assistance, to perform certain service.
- 3691A. Withdrawal or leave of absence from certain education:  
“(a) In general.- (1) A covered member may, after receiving orders to enter a period of covered service, withdrawal or take a leave of absence from covered education.



# Legislative Update

## PUB.L. 117-328-December 29, 2022

- (2)(A) The institution concerned may not take any adverse action against a covered member on the basis that such covered member withdraws or takes a leave of absence under paragraph (1).
- “(B) Adverse actions under subparagraph (A) include the following:
- “(i) The assignment of a failing grade to a covered member for covered education.
- “(ii) The reduction of the grade point average of a covered member for covered education.
- “(iii) The characterization of any absence of a covered member from covered education as unexcused.
- “(iv) The assessment of any financial penalty against a covered member.
- “(b) WITHDRAWAL.—If a covered member withdraws from covered education under subsection
- (a), the institution concerned shall refund all tuition and fees (including payments for housing) for the academic term from which the covered member withdraws.

# 38 U.S. Code § 3672A - Uniform Application

- (1) The Secretary, in partnership with State approving agencies, educational institutions, and training establishments, shall require the use of a uniform application by any educational institution or training establishment seeking the approval of a new course of education under this chapter.
- (2) The Secretary shall maintain one uniform application for institutions of higher learning and one such application for other educational institutions and training establishments.
- (3) In the case of any State that uses approval criteria not covered by a uniform application under this section, the State approving agency for that State shall require the use of the uniform application and may require the submittal of additional information.



# Branch Approval §21.4266

- § 21.4266 Approval of courses at a branch campus or extension.(a)*Definitions*. The following definitions apply to the terms used in this section.
- (1)*Administrative capability* means the ability to maintain all records and accounts that § 21.4209 requires.
- (2)*Certifying official* means a representative of an educational institution designated to provide VA with the reports and certifications that § 21.4203, 21.4204, 21.5810, 21.5812, 21.7152, and 21.7652 require.

# Branch Approval §21.4266

- *Branch campus* means a location of an educational institution that—
- (i) Is geographically apart from and operationally independent of the main campus of the educational institution;
- (ii) Has its own faculty, administration and supervisory organization; and
- (iii) Offers courses in education programs leading to a degree, certificate, or other recognized education credential.
- (Authority: 38 U.S.C. 3675, 3676, 3684)

## Extension Approval §21.4266

- (5) *Extension* means a location of an educational institution that is geographically apart from and is operationally dependent on the main campus or a branch campus of the educational institution.

# Non-College Degree Institution(s) Prior Credit(s) Evaluation

- VA student(s) do not have the option of having their prior credit(s) evaluated
- Colleges, universities and schools must evaluate prior credit for VA students



# Non-College Degree Institution(s)

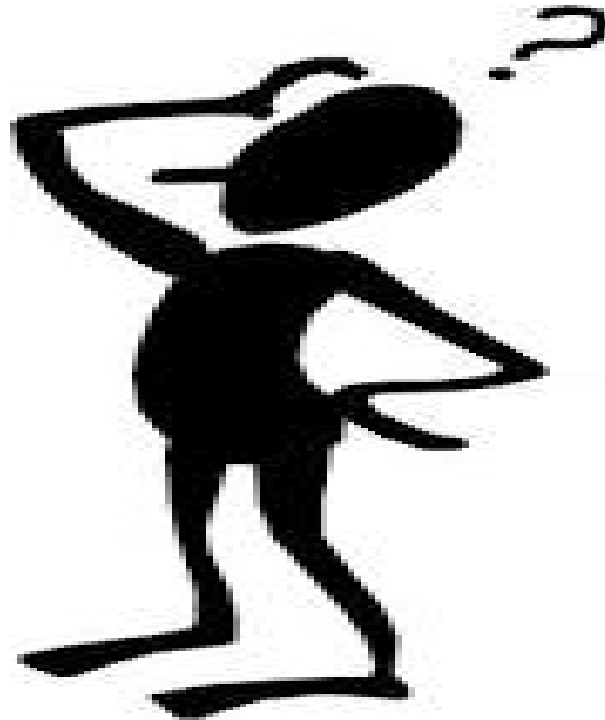
Enrollment dates	4/25/2023-2/1/2024													
Certified Months	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Hours	
Possible				32.5	96.8	82.8	88	96.4	96.8	92.2	88.00	66.00	739.5	
Actual				18.98	88.71	99.64	25.01	30.83	67.02	98.84	78.87	58.84	566.74	
Hours Missed				13.52	8.09	-16.8	62.99	65.57	29.78	-6.64	9.13	7.16	172.76	
						16.8			9/5/2023	VA benefits should have been interrupted.				
Certified Months	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Hours	
Possible	88.00												88.00	
Actual	54.81	2.00											56.81	
Hours Missed	33.19												33.19	
Effective date of Violating the SAP Policy	?			Effective date of Violating the Attendance Policy				Non-Title IV Funds						
				9/5/2024				\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	





# What Constitute a Program Revision?

- Program name
- Program length
- Program delivery



# When should you submit your catalog to the SAA?

- When there is a new printing of the institution's catalog
  - To include the student handbook
- Catalog addenda
  - Calendars with schedules
  - Staff and faculty (revisions)
  - Tuition and fees (revisions)
  - Standards of academic policy
  - Attendance policy
- Complete the Application 3675 or Application 3676
- Note: If you have a new program, the Uniform Application must be utilized to report the new program to the SAA.



# 36-Month Full Reapproval

- All educational institutions that are approved for the VA GI Bill® Education program will be reapproved every 36 months.

# Catalog Approval

- Educational institutions that publish an annual academic catalog will need to submit the catalog to the SAA for compliance purposes.
- Note: If the annual catalog has substantive changes, the educational institution will be required to do a full reapproval.

# Programs Currently Approved Spreadsheet

AutoSave Off Programs Currently Approved No Label - Saved to this PC Search Myers, Frank MF

File Home Insert Page Layout Formulas Data Review View Automate Help Acrobat

Clipboard Font Alignment Number Styles Cells Editing Analysis Sensitivity Add-ins Adobe Acrobat

F13

Voorhees College										
Date >				Catalog		Undergraduate				
Facility Code >				31006240		Academic		2021-2023		
Application 3675 > Programs Currently Approved										
Undergraduate Programs										
Program Identifier in order	Name of Program/Course	IHL	NCD	Program: Revision, Teach-out and Deletion	Current Catalog Page Number (or attach curriculum)	Only Non-College Degree Programs	Credit /Clock Hours	Effective Date	Comments	
11	BA Business Administration	✓			104			8/1/2011		
13	BA Criminal Justice	✓			131			8/16/2010		
15	BA English	✓			124			8/16/2010		
17	BA Interdisciplinary Studies	✓			136			8/11/2017		

Deleted Programs 2021-2023 - Programs - Curr-App New Programs Sheet2

Ready Accessibility: Investigate Display Settings 98%



# WEAMS Report

VA Form 22-1998

**Name:** VOORHEES UNIVERSITY

**Mailing Address**

**Address 1:** PO BOX 678  
**Address 2:** 213 WIGGINS DR  
**Address 3:**  
**City/State/Zip:** DENMARK, SC 29042  
**County:**  
**Foreign Postal Code:**  
**State/Province:**  
**Country:** USA  
**Mil. Post Office:**  
**Mil. Address:**

**Physical Address**

**Address 1:** 1897 VOORHEES ROAD  
**Address 2:**  
**Address 3:**  
**City/State/Zip:** DENMARK, SC 29042  
**County:**  
**Foreign Postal Code:**  
**State/Province:**  
**Country:** USA  
**Mil. Post Office:**  
**Mil. Address:**



# WEAMS Report

New tab x School Certifying Official Handbo x Selected VA Form 22 Report x +

File | S:/CHE/SAA/Active%20Folders/0\_2-Lower%20Region%20Facilities/000\_Pending%20Actions/Voorhees%20Slide%20Presen... A ☆ □ ☆ □

**Address 3:**  
**City/State/Zip:** DENMARK, SC 29042  
**County:**  
**Foreign Postal Code:**  
**State/Province:**  
**Country:** USA  
**Mil. Post Office:**  
**Mil. Address:**

**Phone:**    **Type**    **Number**  
Daytime (803) 703-7119  
Daytime (803) 780-1017  
Fax        (803) 780-4643

**E-Mail:** kgreene@voorhees.edu

**Facility Code:** 31006240

**Status:** Approved on    **Revision Date:** 04/14/2022  
06/01/1966

**App Law:** 3 - Approved    **Branch** Y    **Preferred** N  
For All                      **Location:**    **Provider:**

**Advanced** Y                      **VA Checks To:** Y                      **IHL Exempt:** N  
**Payments:**

**Catalog:**    **Catalog**    **Years**  
2021-2023

**Full Time** 12                      **Full Time** Semester                      **Graduate:**  
**Undergraduate:**                      **Modifier:**



# WEAMS Report

File | S:/CHE/SAA/Active%20Folders/0\_2-Lower%20Region%20Facilities/000\_Pending%20Actions/Voorhees%20Slide%20Presen...

<b>Full Time Undergraduate:</b> 12	<b>Full Time Semester Modifier:</b>	<b>Graduate:</b>
<b>Enrollment Limit:</b>	<b>Enrollment Limit Indicator:</b> None	<b>Course Limit:</b>
<b>Distance Learning:</b> Y	<b>Cooperative:</b> N	<b>Practical Training :</b> Y
<b>Remedial Training :</b> Y	<b>Accreditation:</b> Y	<b>Consortium:</b> N
<b>Air Agency Cert. Date:</b>	<b>Title VI:</b> No Authority	<b>VA-ONCE:</b> Y
<b>Reporting Fee Bar:</b> Eligible	<b>Pay List:</b> Y	<b>Registered APP:</b> N
<b>National Approval:</b> N	<b>IHL with Flight:</b> N	<b>Executive Order 13607:</b> N
<b>Federal Approval:</b> N	<b>Priority Enrollment:</b> N	<b>Online Only:</b> N
<b>Independent Study:</b> Y	<b>STEM:</b> N	

**Remarks:** 05/24/2024-35 PERCENT EXEMPTION EFF 05/21/2024 6-28-23 8794 PROCESSED EFF 6-28-23 WITH TRAINING CERTS VERIFIED FOR PRIMARY SCO ISSUED TO SHOW ACCEPTANCE OF ONE PROGRAM AND CONCENTRATIONS EFF 03/14/2022. SEE SAA LTR DATED 11/07/2022. 09/14/22 - 85/15 PROCESSED EFF 03/07/22 09/14/22-RE-APPROVAL ACCEPTED FOR 2021-2023 CATALOG, PROGRAMS WITH THE SAME CHANGE FROM MICROBIO...





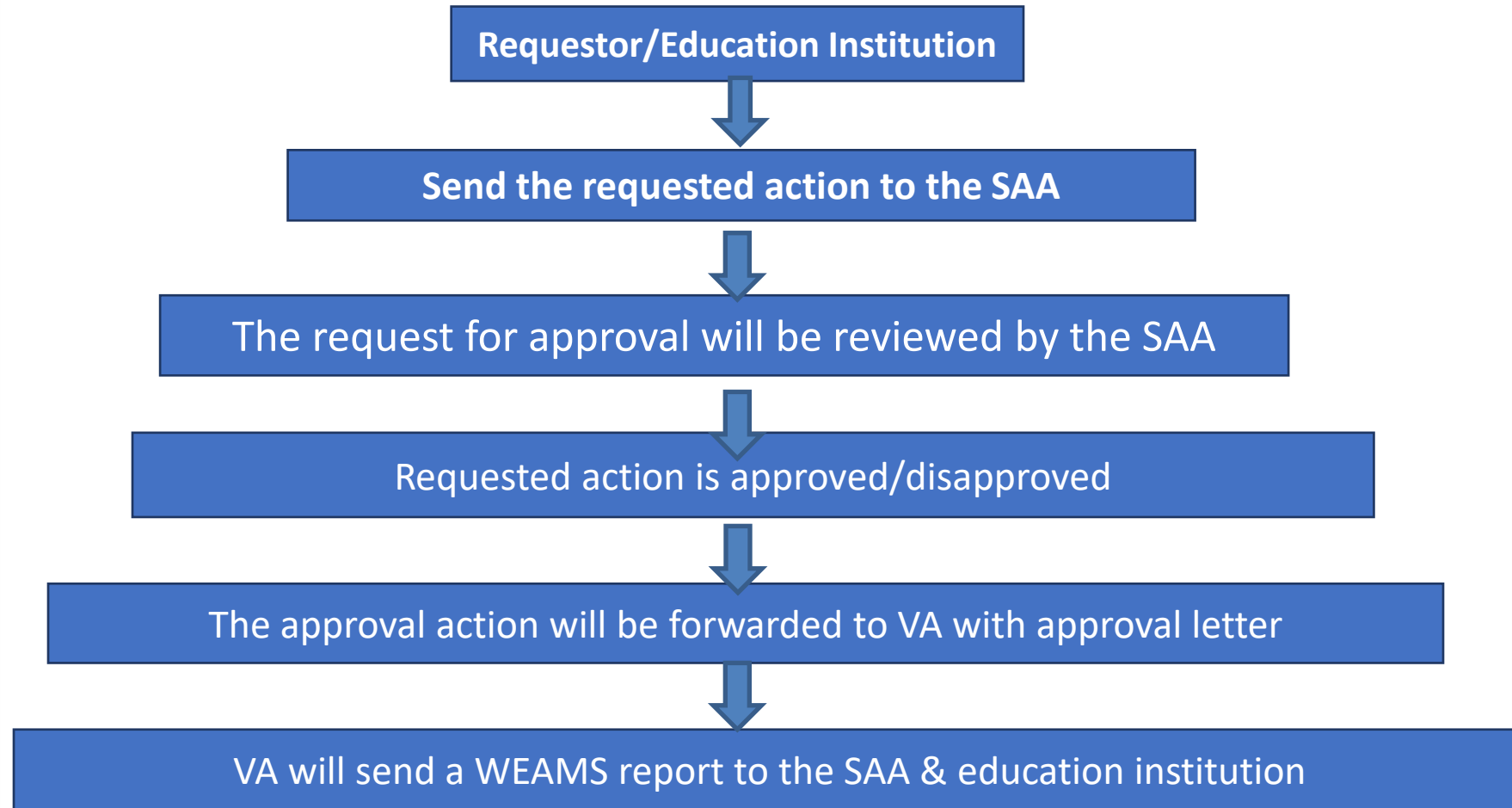


# Technical Assistance to VA School Certifying Officials

- The SAA assist the designated VA School Certifying Official with their existing and new program approvals.
- Educational programs must adhere to Title 38 Code of Federal Regulations (CFR).
- If the existing and the request for new program approvals do not meet the criteria set forth by Title 38 CFR , the program(s) will be immediately disapproved by the SAA.
- VA School Certifying Officials must ensure that VA students are certified correctly in the approved program of study. Failure to certified VA students correctly could result in denial of VA Education Benefits.



# State Approving Agency Approval (SAA) Flow Chart





# Approval Letter

<>Catalog Expiration and Submission to the State Approving Agency (SAA) for Reapproval Dates<>

Last Catalog Sent to VA	Current Academic Catalog	Effective Date	Catalog Submission Date to VA	Catalog Expiration Date	Catalog Submission Date to SAA
2022-2023	2023-2024	8/24/2023	9/18/2024	9/18/2027	5/18/2027

- Note: If your educational institution publishes an annual catalog, please ensure that you send a PDF version with page numbers to the SAA.
- The SAA must complete a full catalog reapproval every 36 months. Please submit your new academic catalog to the SAA by 5/18/2027.



# Academic Catalog Certification Checklist

4\_Catalog Policy Checklist-Undergrad-Grad.pdf - Adobe Acrobat Pro (32-bit)

File Edit View E-Sign Window Help

Home Tools Liberty University S... 1\_Student Intervie... 2\_Student Intervie... ORANGEBURG CAL... 4\_Catalog Policy C... x

1 / 1
 



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SOUTH CAROLINA COMMISSION ON HIGHER EDUCATION  
 SOUTH CAROLINA STATE APPROVING AGENCY (SC SAA)  
 1122 Main Street, Suite 400, Columbia, SC 29201  
 Voice: (803) 737-2260 Fax: (803) 737-3610

**ACADEMIC CATALOG/STUDENT HANDBOOK CHECKLIST AND CERTIFICATION**

*An authorized institutional representative should complete and sign this form. The form should then be returned to the SC SAA along with two copies of the school's current catalog and student handbook and any other document(s) referenced.*

SCHOOL \_\_\_\_\_ CITY \_\_\_\_\_

CATALOG / BULLETIN DATES: \_\_\_\_\_ HANDBOOK DATES: \_\_\_\_\_

*\*Note: On each line below, specify the page number and the publication that contains the required information. For example, if volume number and date of publication are found on page 1 of the catalog, you would write "1-C"; if on page 1 of the handbook, write "1-H"*

Undergraduate Policies	SAA Initial	Graduate Policies	SAA Initial	
				1. Volume number and date of publication
				2. Names of school governing body, officials, and faculty
				3. Calendar showing beginning and ending dates of each term, holidays, and other important dates
				4. Policy for minimum entrance requirements
				5. Policy on granting credit for prior education
				6. Grading system (to include policy for removing Incomplete (I) grades)
a.		a.		7. School's policies describing conditions under which a student's training/benefits would be interrupted: a. probationary period if say _____ b. academic progress c. unsatisfactory conduct
b.		b.		
c.		c.		
				8. Policy describing conditions which must be satisfied to allow a student to be re-instated or re-enrolled following interruption of training/benefits
				9. Policy concerning leave _____, attendance _____, and tardiness <u>NA</u>
				10. Statement of academic progress records maintained by the school and furnished to the student
				11. Graduation requirements
				12. Schedule of tuition and fees, and/or total cost of each course
				13. Policy describing pro-rata refund of tuition and fees as required by CFR 21.4255 (for Non-Accredited Colleges / Universities Only)

I certify that this CATALOG/HANDBOOK/BULLETIN is true and correct in content and policy.

Name of Authorized Institutional Representative:

Print Name: \_\_\_\_\_ Signature: \_\_\_\_\_

Title: \_\_\_\_\_ Telephone: \_\_\_\_\_



# Catalog Reapproval Statements



The screenshot shows a PDF editor window with several tabs at the top: 'Breannah Henderson - ...', 'NASAA Professional D...', 'DRAFT ELR Job Aid M...', 'Wando HS Student & P...', and '7\_Catalog Qaulification ...'. The active tab is '7\_Catalog Qaulification ...'. The editor toolbar includes 'All tools', 'Edit', 'Convert', and 'E-Sign'. A search bar on the right says 'Find text or tools'. The document content is as follows:

Catalog Approval - 24 Months Requirement Verification Checklist

Educational Institution Verification of Reputation(s), Character(s) and Experience Qualification(s)

Date: \_\_\_\_\_

Name of Institution: \_\_\_\_\_

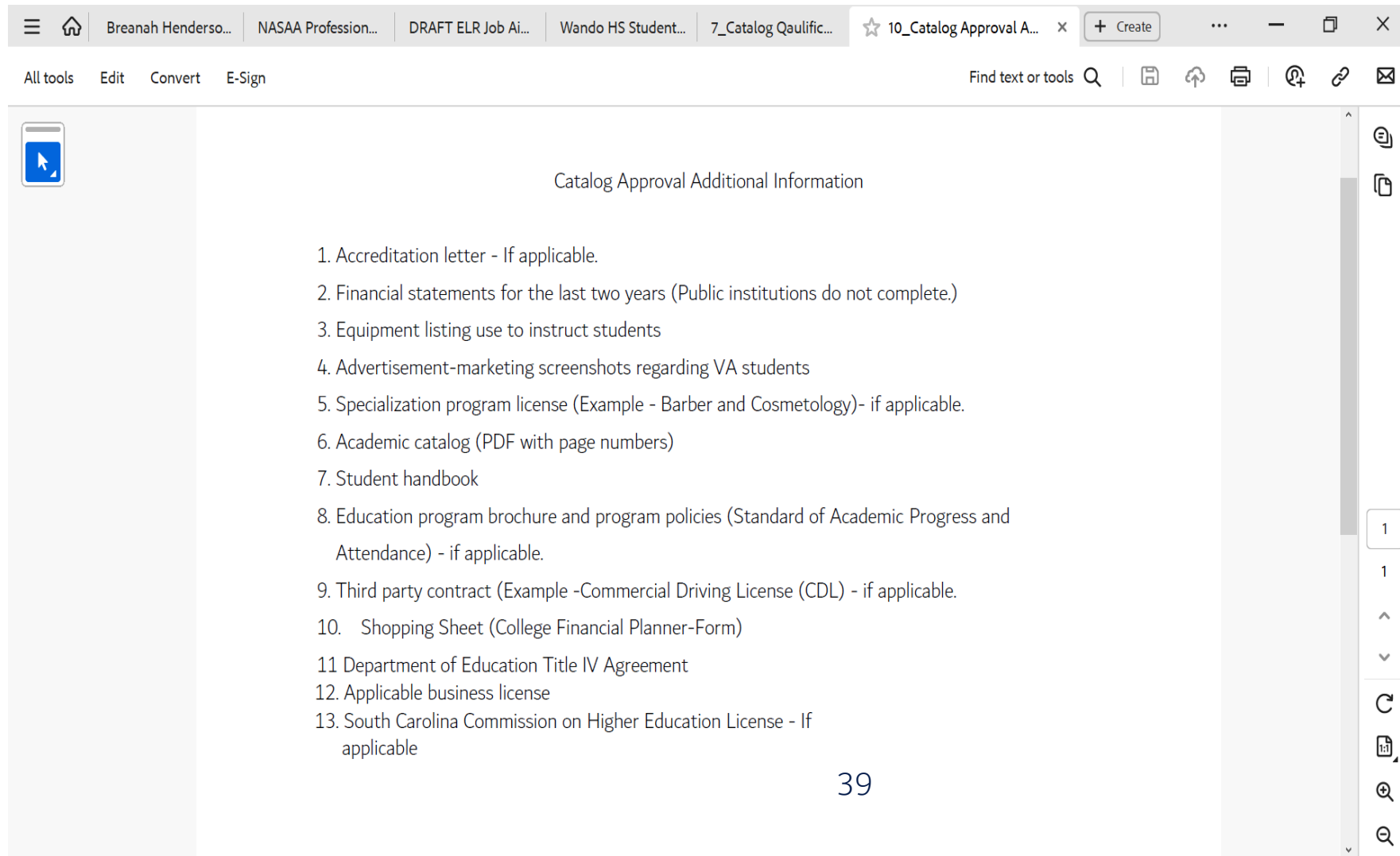
Facility Code: \_\_\_\_\_

Dear South Carolina Commission on Higher Education State Approving Agency:

- All our owners, administrators, directors, and instructors are of good reputation and character.
- The educational and experience qualifications of directors, administrators, and instructors are adequate.
- The equipment and instructional material is adequate, and that the instructor personnel can provide training of good quality.



# Catalog Reapproval Additional Information



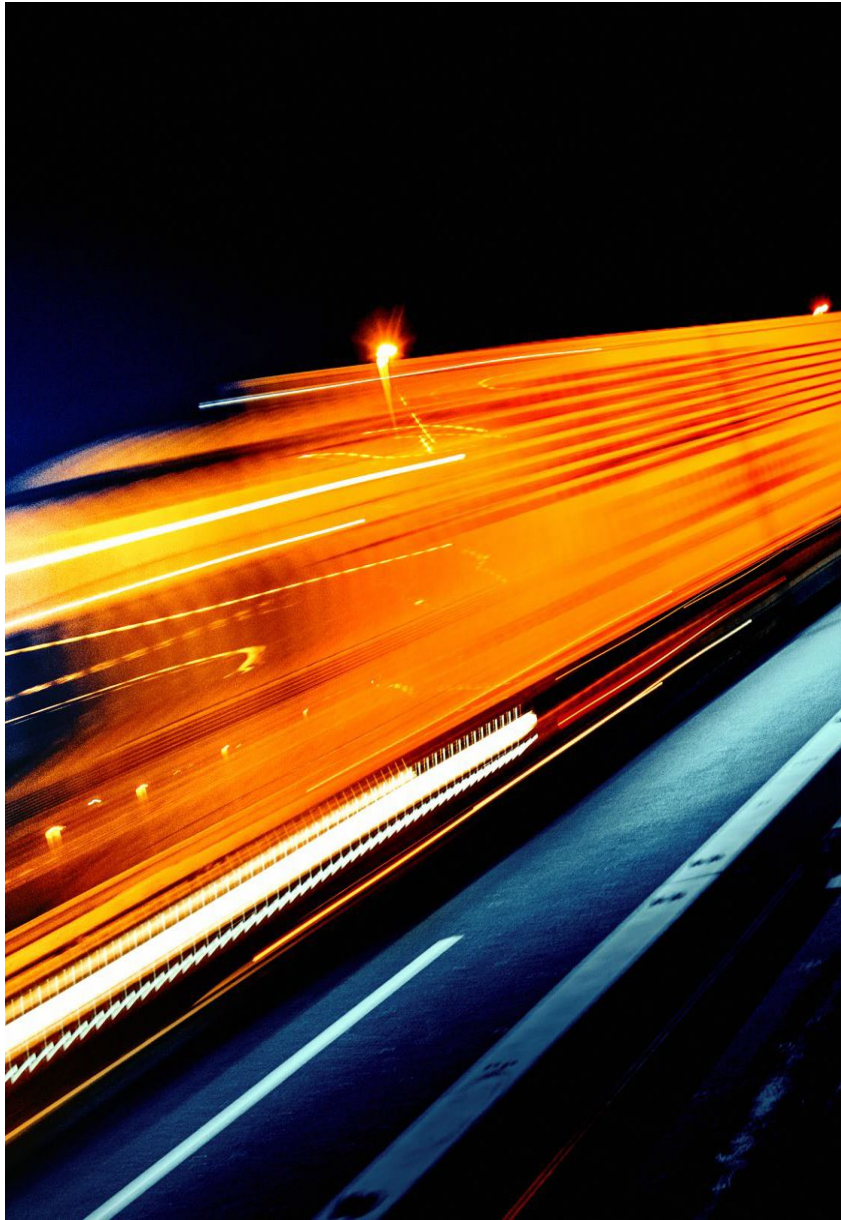
The image shows a screenshot of a PDF viewer application. The browser's address bar and tabs are visible at the top, with the active tab titled '10\_Catalog Approval A...'. The PDF viewer's toolbar includes options for 'All tools', 'Edit', 'Convert', and 'E-Sign', along with search and navigation icons. The main content area displays the title 'Catalog Approval Additional Information' and a numbered list of 13 items. A vertical sidebar on the right contains navigation icons and a page number indicator showing '1'.

Catalog Approval Additional Information

1. Accreditation letter - If applicable.
2. Financial statements for the last two years (Public institutions do not complete.)
3. Equipment listing use to instruct students
4. Advertisement-marketing screenshots regarding VA students
5. Specialization program license (Example - Barber and Cosmetology)- if applicable.
6. Academic catalog (PDF with page numbers)
7. Student handbook
8. Education program brochure and program policies (Standard of Academic Progress and Attendance) - if applicable.
9. Third party contract (Example -Commercial Driving License (CDL) - if applicable.
10. Shopping Sheet (College Financial Planner-Form)
11. Department of Education Title IV Agreement
12. Applicable business license
13. South Carolina Commission on Higher Education License - If applicable



# Risk-Based Surveys





# Risk-Based Surveys

- **Risk-Based Survey (RBS):** An onsite review conducted at education and training institutions to check compliance and mitigate risk factors and associated practices.
1. For the State Approving Agency to conduct a compliance action as an agent under contract for the Federal government assessing various legislative and Department determined risk factors.
  2. For the State Approving Agency to ensure that education and training institutions with approved programs meet all federal and state statute and regulations aligning to the GI Bill®.

# Risk Factors

- Rapid student population increase
- Rapid tuition and fee payment increase
- Volume of validated student complaints
- Severity of student complaints
- 85/15 rule violations
- Veteran completion rates
- Financial stability
- Federal or State government actions in court
- Change from for-profit to not-for-profit status (3 years)



# Pre-Survey

## ➤ **Student Documents**

Five (5) pre-visit records (4 VA; 1 non-VA) and five (5) onsite records (4 VA; 1 non-VA)

## ➤ **Advertising Documents**

Request digital print, video & radio ads, transcripts, enrollment counselor scripts, third party entities, websites and all social media

## ➤ **Financial Soundness Document**

Collect most recent two years of Balance Sheets, Income Statements, Cash Flow Statements, Compiled Financial Statements, 90/10 Documentation, 85/15 Statements

## ➤ **Complaints**

Request complaints filled directly with school  
Review Salesforce & Better Business Bureau for complaint

## ➤ **ETI Specific Data**

Request Graduation Rates, Veteran Graduation Rates, Licensing Rates, Job Placement Rates

## ➤ **Contact Information**

Request contact information is needed for anyone who can answer questions relating to the areas of review

# Conduct Onsite Survey

- **Onsite Review**

Review instructors, courses, facilities, equipment, learning resources and teaching devices

- **Student File Review**

Five (5) onsite records (four VA and one non-VA)

- **Student Interview**

SAA Will schedule a block of time to conduct student interviews

- **Request to sit in on instruction**

- **If a risk is a specific program, request information for that specific program**

- **Shall be included in RBS documentation**

# Final Report/Narrative

- **Securing affirmation of program approval(s) following RBS is required.**
- If the RBS is conducted by the SAA, the SAA shall include the following elements in the exit briefing and narrative:

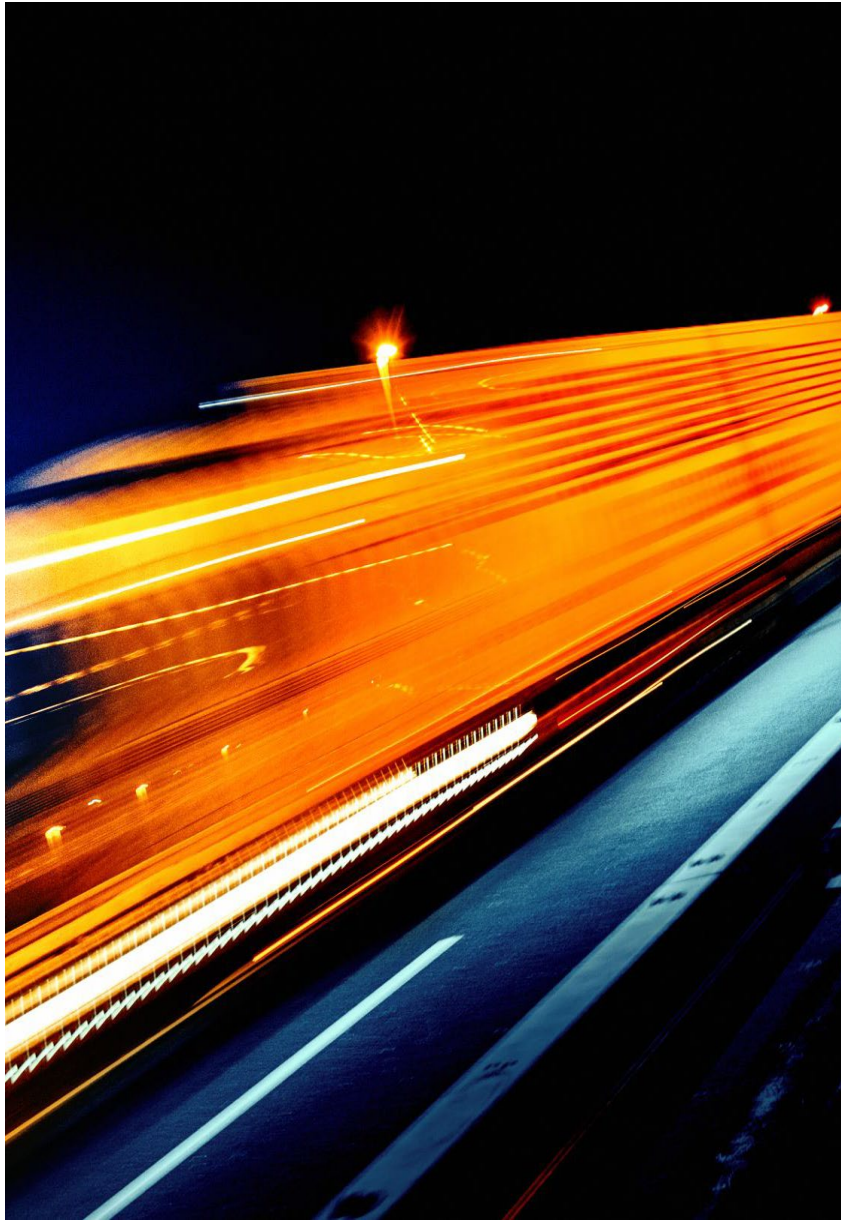
**Findings with no impact to** Title 38 Approval requirements: Inclusion in the exit briefing and narrative indicating that findings do not impact the ETIs current approval.

**Findings that could potentially impact** Title 38 Approval requirements: Inclusion in the exit briefing and narrative that findings will be reviewed by the SAA of jurisdiction as it relates to the ETIs current approval status. Subsequent notification from the SAA, will follow indicating affirmation of the approval, or action has been taken to reflect a suspended or withdrawn status. Affirmation, suspension, or withdrawal action should be initiated within the referral timeframes established by the Cooperative Agreement.

# Failure to Comply

- As a result of the Isakson and Roe Veterans Health Care and Benefits Improvement Act of 2020 (Public Law 116-315), section 1017 amended chapter 36 of Title 38 USC §3679 to establish grounds for disapproval of a course when an Education and Training Institution (ETI) fails to comply with a risk-based survey or fails to secure an affirmation of approval following the risk-based survey by the SAAs of jurisdiction.
  
- **An ETI can fail to comply with an RBS by one of the following:**
  1. Failure to respond to a request to schedule an RBS within 6 business days.
  2. Failure to provide or produce documentation upon request during a compliance action under CFR 21.4209.

# Supervisory Visits



# Supervisory Visits

- The visit will allow SAAs an opportunity to reacquaint ETIs with all approval matters, which includes covering specific requirements for maintaining approval.
- The Supervisory Visit provides the opportunity to ensure ETIs understand the differing roles and responsibilities of the SCO, the SAA, and VA by answering specific questions, helping identify solutions to problems, providing guidance, or providing intervention in the case of noncompliance with approval standards or certification requirements, or issues potentially leading to such noncompliance.
- For FY25, ETIs with less than 17 active VA beneficiaries will be visited, unless an exception exists.





# Exceptions

- A complete turnover of SCO(s) at an ETI within the last 60-days
- The SAA has been notified by VA of a reactivated ETI and such ETI has yet to provide SAA requested catalog submission
- RBS findings that require follow-up action
- Change of ownership that does not involve change in profit status
- SAA has received a Supervisory Visit request from ETI
  - ETI must submit to SAA a Supervisory Visit Request Letter



# Review of Approval Criteria

- Current catalog or bulletin
- Changes in School Certifying Official(s)
- Change of ownership or location
- Shopping Sheet/College Financing Plan
- Accreditation Status
- 85/15 ratio or 35% Exemption
- Current VA Form 22-1919, if required
- Advertising, sales, and enrollment practices
- SAAs will need to review reports of previously conducted



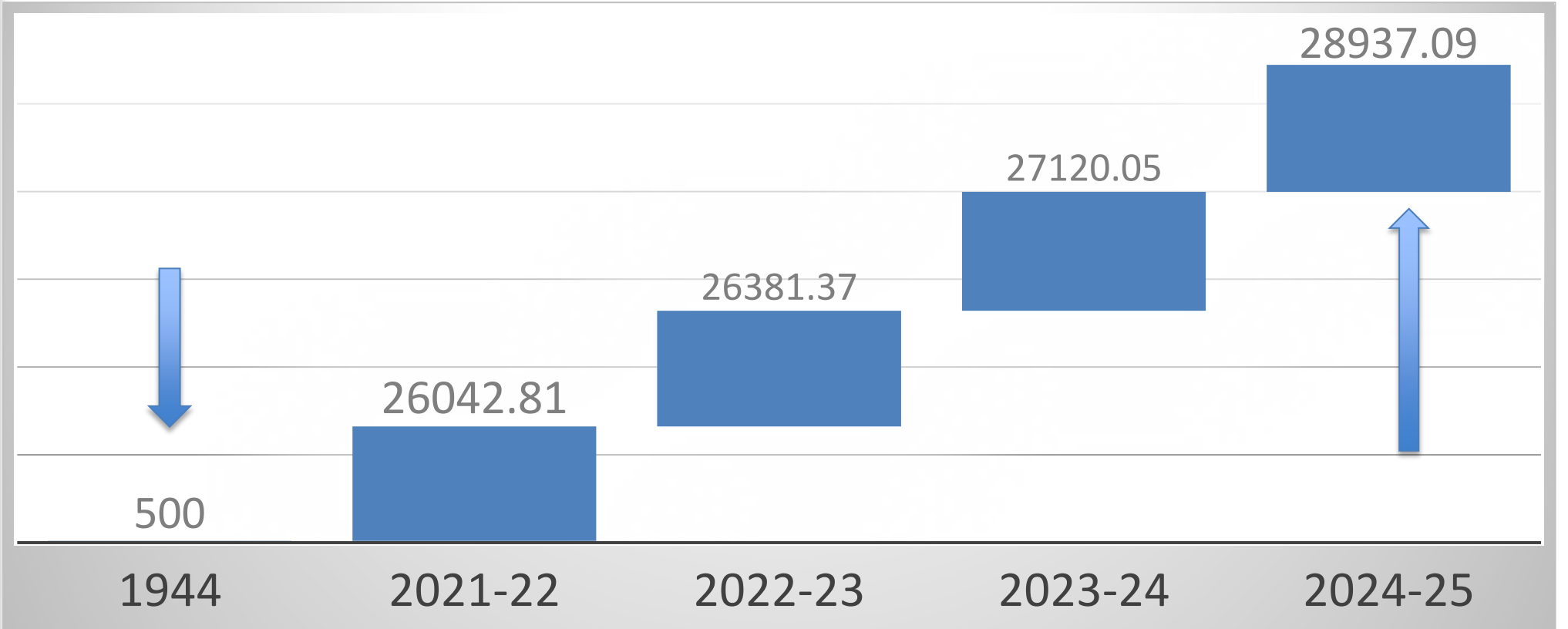
# Student File Review

- ❑ A review of student records aids the SCO with issues that need clarification and verifies compliance with regulations.
- ❑ A minimum of three (3) VA beneficiary records shall be reviewed, unless there are fewer than three available.
- ❑ One (1) non-VA beneficiary's student account ledger and unofficial transcript to capture program information shall be reviewed to determine compliance with charges (not required for training establishments).
- ❑ For each file reviewed, the SAA shall verify that documentation in the student's record demonstrates appropriate policies are in place and enforced; ensure the tuition and fees reported to VA were accurate per the approved catalog and/or enrollment agreement; and validate if changes were reported to VA appropriately.



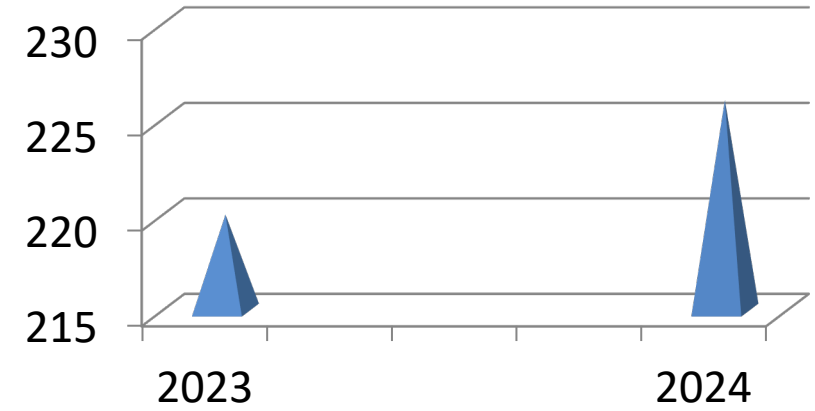


# GI Bill® Tuition Rates



# Active Educational Institutions and Training Establishments- FY23 and FY24

FY24		FY25
IHL-92		IHL-92
NCD-56		NCD-63
APP-35		APP-29
OJT-37		OJT-42
Total-220		Total-226

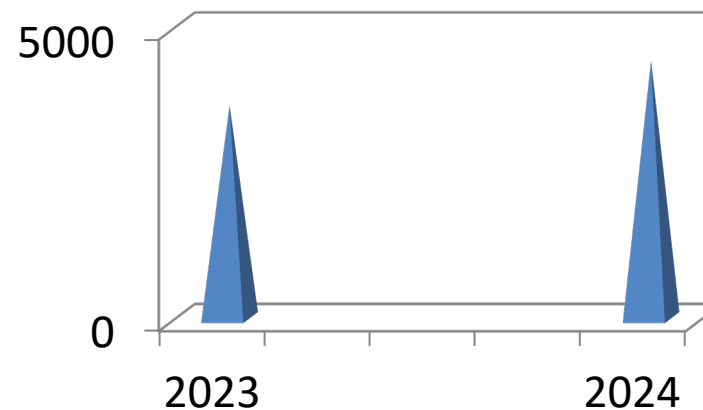


# Program Approval Actions

## Educational Institutions and Training Establishments

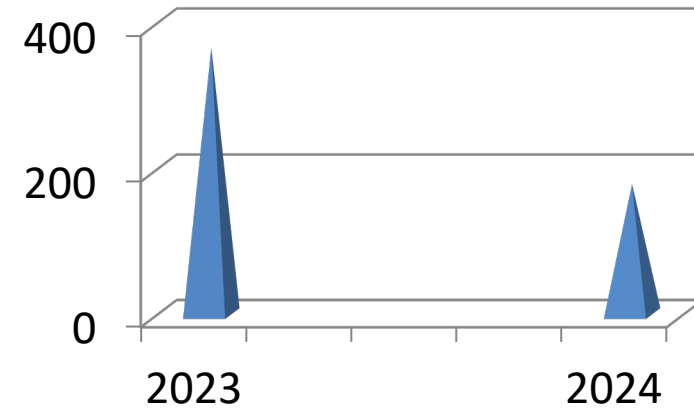
### FY23 and FY24

FY23		FY24
IHL-3344		IHL-2775
NCD-284		NCD-1612
APP-4		APP-9
OJT-6		OJT-9
Total-3638		Total-4405



# Approval Action Program Disapprovals Educational Institutions and Training Establishments FY23 and FY24

FY23		FY24
IHL-96		IHL-88
NCD-169		NCD-88
APP-0		APP-9
OJT-0		OJT-2
Total-365		Total-178





# Top 10 Educational Institutions with VA Student Enrollments

	Educational Institutions	VA Students Receiving GI® Education Benefits
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		



# State Approving Agency Contact Information

- **Frank Myers-Director**  
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- **Crystal Standifer-Program Coordinator**  
Email: [cstandifer@che.sc.gov](mailto:cstandifer@che.sc.gov) - Phone: 803.856.0603
- **Administrative Assistant-Currently vacant**





# Question(s)

