

## **Compliance Survey Packet**

The checklist has been provided as a tool when gathering the documentation, required to complete the compliance survey. The Required School Documentation form, School Procedures Questionnaire, and Public Law 116-315 Section 1018 questionnaire will all be documentation we need to be filled out, signed and returned to the Compliance Survey Specialist to complete the review.

### **Record Checklist**

Each type of record must contain sufficient detail in order to determine whether the facility is meeting the compliance requirements of GI Bill® benefit programs. Please see the descriptions below for additional information on student documentation and school documentation.

#### **School Documents**

During the compliance survey access to all documentation is required. In addition, physical or unalterable electronic copies of documents identified should be provided to your surveyor and will be retained by VA in your facility's Compliance Survey record.

<input type="checkbox"/>	<b>Tuition and Fees Schedule</b> A copy or unalterable PDF of your facility's tuition and fees schedule (extending back three academic years.) <input type="checkbox"/> Description of mandatory fees charged by school. <input type="checkbox"/> List of course-specific fees <input type="checkbox"/> File name example "FY24-12345678-Tuition Schedule 20XX-20XX"
<input type="checkbox"/>	<b>Academic Year Calendar</b> A copy or unalterable PDF of your facility's academic calendars (extending back three academic years.) These calendars should include all summer, winter, and mini/module term dates, as applicable. <input type="checkbox"/> File name example "FY24-12345678-Academic Calendar 20XX-20XX"
<input type="checkbox"/>	<b>Title 38 USC 3679(e) Compliance</b> Unalterable PDF of your institutional policy in place that will allow an individual to attend or participate in a program of education if the Chapter 31 or Chapter 33 Beneficiary provides the school with a "Certificate of Eligibility (COE)." <input type="checkbox"/> File name example "FY24-12345678-3679e compliance"
<input type="checkbox"/>	<b>Current Roster</b> A roster of all current students enrolled in each approved program and emphasis. <input type="checkbox"/> File name example "FY24-12345678-Student Roster by Program Name"
<input type="checkbox"/>	<b>List of Tuition Specific Scholarships or Waivers</b> A listing of tuition specific scholarships or waivers commonly used by your facility. Identify awards that are specifically designated to be applied toward tuition/fees only, as a tuition discount, etc. <input type="checkbox"/> File name example "FY24-12345678-Tuition Specific Scholarships or Waivers"
<input type="checkbox"/>	<b>Copies of Advertising Material (past 12 months)</b> A copy of all advertising used by your facility during the last 12 months: For Example: A copy of an ad in a newspaper, magazine, or social media platform; or a transcript of a television, radio, or internet ad. <input type="checkbox"/> File name example "FY24-12345678-Advertisement"
<input type="checkbox"/>	<b>School Yellow Ribbon Policy (if applicable)</b> All financial records relating to the school's scholarship or grant for their Yellow Ribbon portion of tuition and fees, how the amounts reported/paid were calculated, how and when students become eligible or not, the exact source for the funding of the scholarship or grant, as well as records showing that the VA's Yellow Ribbon payment was applied to the student's account. <input type="checkbox"/> File name example "FY24-12345678-YRP policy"
<input type="checkbox"/>	<b>Annual Reporting Fees (ARF) Documentation</b> A copy of documentation to support how your school utilizes its Annual Reporting Fees (ARF) <input type="checkbox"/> File name example "FY24-12345678-ARF Reports"
<input type="checkbox"/>	<b>Current unpaid student balance list and documentation showing your institution's policy on collections of unpaid balances of tuition and fees only (Nonaccredited Only). Limited to the period of the survey and not to exceed three years.</b> <input type="checkbox"/> File name example "FY24-12345678-Unpaid balances report"

<input type="checkbox"/>	<b>Contractual Agreements (if applicable)</b> A contracted course is any part of a program of education offered by any educational institution if the educational institution or entity providing the course is under contract with the educational facility offering the program. <input type="checkbox"/> File name example "FY24-12345678-Contractual Agreement with Facility Name"
<input type="checkbox"/>	<b>Student Interview Notification Email (if applicable)</b> A copy of the email you sent to your school notifying your VA students that VA is conducting a compliance survey and will be onsite, as directed by the notification letter. <input type="checkbox"/> File name example "FY24-12345678-student email notification"

## Student Documents

During the compliance survey access to all documentation is required. In addition, physical or unalterable electronic copies of documents must be provided to your surveyor to be formally retained by VA in your facility's Compliance Survey record.

<input type="checkbox"/>	<b>Unofficial Transcript</b> A copy of the student's current transcript at your facility. <ul style="list-style-type: none"> <li><input type="checkbox"/> This document must include courses taken, grades, term-by-term GPA, and cumulative GPA.</li> <li><input type="checkbox"/> This document must be complete and current through the last term completed by student.</li> </ul>
<input type="checkbox"/>	<b>Financial Ledgers (showing charges and credits)</b> For all VA beneficiaries: It must be expressly noted in the student's file if the student's course or course(s) are being paid for in whole or in part under the Government Employees' Training Act (GETA). For Chapter 33 beneficiaries: It is imperative debits and credits on the student's ledger are identifiable by name. If a coding system is used, provide an explanation of the coding system and what various entries represent. The ledgers must include: <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> All charges to the student's account, all payments/credits to the student's account from VA and all other sources including institutional, private, federal and other financial aid program (scholarship payment requirements).</li> <li><input type="checkbox"/> Must be detailed enough to determine the source of all charges and credits/payments, including how charges were determined and payments were credited.</li> <li><input type="checkbox"/> The term in which any charges/payments/credits occur should be clearly identified and linked to the appropriate dollar amount.</li> <li><input type="checkbox"/> VA payments and refunds should be clearly labeled as such. This includes Yellow Ribbon payments (both VA and school payments).</li> <li><input type="checkbox"/> Do not lump other campus payments (with a separate facility code) within the payments for your campus.</li> </ul>
<input type="checkbox"/>	<b>Degree/Program Requirements</b> A copy of the student's degree plan checklist (program outline/curriculum) or degree progress audit report. <ul style="list-style-type: none"> <li><input type="checkbox"/> This document must reflect courses required for the student's program of study. If the student has pursued more than one program at your school (to include minors), include program plans for each program.</li> </ul>
<input type="checkbox"/>	<b>Enrollment Agreement (if applicable)</b> Enrollment agreement(s)/contract between school/student.
<input type="checkbox"/>	<b>Application for Admission to School</b> Completed application for admission to school.
<input type="checkbox"/>	<b>Transfer Credit Evaluation</b> A copy of transfer evaluation data sheet showing student's prior school(s)/military credits that were evaluated. <ul style="list-style-type: none"> <li><input type="checkbox"/> This sheet should clearly demonstrate what, if any, credits were awarded to the student.</li> <li><input type="checkbox"/> If the student has no applicable prior or transfer credits, a signed statement must be provided which notates that your facility reviewed for prior/transfer credit, and none was found applicable.</li> </ul>
<input type="checkbox"/>	<b>Class Schedule</b> Class Schedules must be provided for each term/semester/quarter. <ul style="list-style-type: none"> <li><input type="checkbox"/> Include begin and end dates of course(s), days per week course(s) are scheduled to meet, hours per day, and location each class is scheduled to meet.</li> <li><input type="checkbox"/> Be sufficient for VA to verify whether any class meets the regulatory requirements to be considered resident or distance.</li> <li><input type="checkbox"/> Be coded to differentiate between resident and online and campuses (and should also be made clear in the catalog, handbooks, etc.).</li> </ul>
<input type="checkbox"/>	<b>Attendance Records (if applicable)</b> A copy of detailed attendance records in accordance with published attendance standards.
<input type="checkbox"/>	<b>Unsatisfactory Progress Documentation (if applicable)</b>

	Records regarding actions taken related to unsatisfactory academic progress.
<input type="checkbox"/>	<b>Remedial Test Scores (if applicable)</b> A copy of detailed test scores or evaluations used to determine the student's need for remedial courses.
<input type="checkbox"/>	<b>College Financing Plan</b> A copy of personalized College Financing Plan (Shopping Sheet) for each student.
<input type="checkbox"/>	<b>Related Student Documents (e.g., Drop/Withdrawal Slips, Mitigating Circumstances Documentation, Parent Institution Letter).</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> Drop/withdrawal slips and other documentation indicating last dates of attendance.</li> <li><input type="checkbox"/> Appropriate documentation supporting any certified mitigating circumstances, such as medical statements, etc.</li> <li><input type="checkbox"/> Documentation at parent institution to grant secondary institution subject. The parent institution should also obtain grade reports from the secondary institution. The secondary institution should maintain the parent school letter.</li> </ul>
<input type="checkbox"/>	<b>Financial Aid Offer Letter</b> A copy of all Financial Aid and Scholarship offers to the student.
<input type="checkbox"/>	<b>VA Work Study student files (if applicable)</b> A copy of contracts, time sheets, etc.
<input type="checkbox"/>	<b>Non-Veteran Record(s)</b> Student record(s) of similarly circumstanced students. Student record(s) will be identified by your reviewer when they arrive. A listing of Non-Veteran students may be requested to assist with the selection of records. <ul style="list-style-type: none"> <li><input type="checkbox"/> Unofficial Transcript</li> <li><input type="checkbox"/> Financial Ledger</li> </ul>

## Required School Information

Name of Facility	
Facility Code	
Facility Tax Identification Number (TIN)	

(Chapter 30) Number of Students Currently Enrolled and Receiving Montgomery GI Bill – Active-Duty Benefits	
(Chapter 31) Number of Students Currently Enrolled and Receiving Vocational Rehabilitation and Employment Benefits	
(Chapter 32) Number of Students Currently Enrolled and Receiving Post-Vietnam Era Veterans Educational Assistance Program Benefits	
(Chapter 33) Number of Students Currently Enrolled and Receiving Post-9/11 GI Bill Benefits	
(Chapter 35) Number of Students Currently Enrolled and Receiving Survivors and Dependents Educational Assistance Benefits	
(Chapter 1606) Number of Students Currently Enrolled and Receiving Montgomery GI Bill – Selected Reserve Benefits	
Total Number of Students Currently Enrolled That Are Not Receiving VA Benefits	

Provide a detailed description of how your school utilizes its Annual Reporting Fees (ARF)	
If your school received an ARF payment for 100 or more VA beneficiaries, are the ARF released to your school merged with a general fund?	<input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> My school received an ARF payment for less than 100 VA Beneficiaries
Does your school offer Priority Enrollment to Veterans, Servicemembers, and Reservists?	<input type="checkbox"/> No <input type="checkbox"/> Yes
Has any School Certifying Official received VA Education Benefits while attending your facility?	<input type="checkbox"/> No <input type="checkbox"/> Yes

Name of Individual Completing This Form	
Title of Individual Completing This Form	
Signature of Individual Completing This Form	

## School Procedures Questionnaire

How are VA student files maintained?	
How is the School Certifying Official (SCO) notified of changes in enrollment, to include suspension or graduation?	
Is your facility approved for GI Bill Advanced Payments, what process does the facility have in place for safeguarding and distributing the payment?	
Are any programs or courses offered at your facility provided by another school or entity under contract?	
Does your facility offer independent study courses, cooperative courses, or correspondence courses?	
Do any students receive VA tutorial assistance (VA Form 22-1990T)? If so, how are tutors selected?	
Do any students participate in VA Work Study program? If so, also attach Work Study job description.	
Does your facility exercise power of attorney authority to negotiate educational assistance checks on behalf of any VA students?	
If your school participates in the VA Chapter 33 Yellow Ribbon Program, please describe how you determine the Yellow Ribbon amount you report on a student's VA Chapter 33 certification, and how you maintain a student participant roster?	

Name of Individual Completing This Form	
Title of Individual Completing This Form	
Signature of Individual Completing This Form	
Name of Facility	
Facility Code	

## Compliance Survey Student List

[illegible]

**Public Law 116-315 Section 1018: Requirements for educational institutions participating in the educational assistance programs of the Department of Veterans Affairs**

Section 1018 is effective June 15, 2021, applies to Institutions of Higher Learning and Non-College Degree institutions beginning August 1, 2021, [Financial Aid Shopping Sheet \(ed.gov\)](#). The provision mandates adherence to the requirements of the Principles of Excellence, currently in [Presidential Executive Order #13607](#), among other requisites to maintain approval for GI Bill® participation and obligates schools that receive federal funding through programs such as the GI Bill® to follow certain guidelines. You must provide responses to the questions below. These questions may be outside of the scope of your regular duties as the designated School Certifying Official. Please have the appropriate office within your school assist you with gathering the needed information.

1	Does your school provide a "College Financing Plan" to Veteran students and their dependents?	<b><u>**If yes, provide a copy of the College Financing Plan your facility provided to each student in your survey.</u></b>
2	Does your school have policies to alert and inform Veteran students and their dependents to the availability of Federal financial aid prior to arranging other financing?	
3	Does your school use recruiters to increase enrollment of Veterans and their dependents? If so, please describe the standard methods used, to include any payments or incentive compensations.	
4	Has your school obtained the approval of its accrediting agency for new course offerings prior to enrolling students in such courses or programs where appropriate?	
5	Are Servicemembers and Reservists readmitted to programs if they are temporarily unavailable to attend class or must suspend their studies due to service requirements and accommodations made for short absences resulting from service obligations?	
6	Does your school fully disclose conditions or additional requirements, including training, experience, or examinations, required to obtain the license, certification, or approval for which the course of education is designed to provide preparation?	
7	Does your school provide detailed educational plans to Veteran students and their dependents outlining graduation requirements?	
8	Does your school have a point of contact for academic and financial advising to assist Servicemember and Veteran students and their families?	<b><u>**If yes, provide name, title, and contact information for the point of contact.</u></b>

<b>Name of Individual Completing This Form</b>	
<b>Title of Individual Completing This Form</b>	
<b>Signature of Individual Completing This Form</b>	
<b>Name of Facility and Facility Code</b>	



## **AUTHORITY TO VIEW RECORDS**

[38 USC 3690](#) states:

“(c) Examination of Records. Notwithstanding any other provision of law, the records and accounts of educational institutions pertaining to eligible Veterans or eligible persons who received educational assistance under this chapter or chapter 31, 32, 34, or 35 of this title, as well as the records of other students which the Secretary determines necessary to ascertain institutional compliance with the requirements of such chapters, shall be available for examination by duly authorized representatives of the Government.”

[38 CFR 21.4209](#) states:

“(a) Availability of records. Notwithstanding any other provision of law, an educational institution, including for purposes of this section an organization or entity offering a licensing or certification test, must make the following records and accounts available to authorized Government representatives:

(1) Records and accounts pertaining to Veterans or eligible persons who received educational assistance under 10 U.S.C. chapter 1606 or 38 U.S.C. chapter 30, 32, 33, 35, or 36:

(2) Other students' records necessary for the Department of Veterans Affairs to ascertain institutional compliance with the requirements of these chapters; and

(3) The records of other individuals who took a licensing or certification test that VA believes are necessary to ascertain whether the Veterans and eligible persons taking such test were reimbursed the correct amount.

(b) Type of records. Each educational institution must upon request of duly authorized representatives of the Government make available for examination all appropriate records and accounts, including but not limited to:

(1) Records and accounts which are evidence of tuition and fees charged to and received from or on behalf of all Veterans, reservists, and eligible persons and from other students similarly circumstanced;

(2) Records of previous education or training of Veterans, reservists, and eligible persons at the time of admission as students and records of advance credit, if any, granted by the educational institution at the time of admission;

(3) Records of the Veteran's, reservist's, or eligible person's grades and progress;

(4) Records of all advertising, sales or enrollment materials as required by §21.4252(h) and section 3696(b), title 38 U.S.C.;

(5) Records and computations showing compliance with the requirements of §21.4201 regarding the 85-15 percent ratio of students for each course; and

(6) Records necessary to demonstrate compliance with the requirements of §21.4252(e) pertaining to the time necessary to complete a correspondence course.

(7) Records necessary to demonstrate compliance with the requirements of §21.4268.

(c) Noncollege degree, apprentice, and other on-the-job. The educational institution having Veterans, servicemembers, reservists, and/or eligible persons enrolled in a course that does not lead to a standard college degree must make available, in addition to the records and accounts required in paragraph (b) of this section, the records of leave, absences, class cuts, makeup work, and tardiness. Each training establishment that has enrolled Veterans under 38 U.S.C. chapter 30, 32, or 33, reservists under 10 U.S.C. chapter 1606, or eligible persons under 38 U.S.C. chapter 35 must also make available payroll records.

(d) Nonaccredited courses. The educational institution having Veterans or eligible persons enrolled in nonaccredited courses must make available, in addition to the records and accounts required in paragraphs (b) and (c) of this section the following:

(1) Records of interruptions for unsatisfactory conduct or attendance.

(2) Records of refunds of tuition, fees and other charges made to a Veteran or eligible person who fails to enter the course or withdraws or is discontinued prior to completion of the course.

(e) Nonavailability. Failure to make such records available as provided in this section will be grounds for discontinuing the payment of educational assistance allowance or special training allowance."

Please note that schools and training establishments must make records of progress and training, tuition and fees charges, and other records available upon request by a duly authorized representative of the Government. The records of both VA students and non-VA students will be reviewed when comparing tuition and fees charges. It has been determined that school records relating to VA benefits fall into the "financial aid" category and are therefore exempt from the provisions of the Buckley amendment. Therefore, the VA shall have access to the records of VA beneficiaries as well as non-VA students without the written consent of the student in order to monitor the school's compliance with the law. [38 United State Code 3690\(c\)](#).