



# Compliance Surveys



Date May 2023

# Overview

Compliance surveys are routine reviews of schools and training facilities receiving funding from the Department of Veterans Affairs (VA) for approved education programs.



During compliance surveys, VA or its agents review an institution's records to verify they are certifying correctly and maintaining proper documentation.

# Learning Objectives



1

Recognize legal requirements for Compliance Surveys

2

Summarize the Compliance Survey process

3

Describe areas reviewed during a Compliance Survey




# Legal Requirements for Compliance Surveys

- Statutory Requirements
- Objectives
- Availability of Records
- Record Retention
- Best Practices



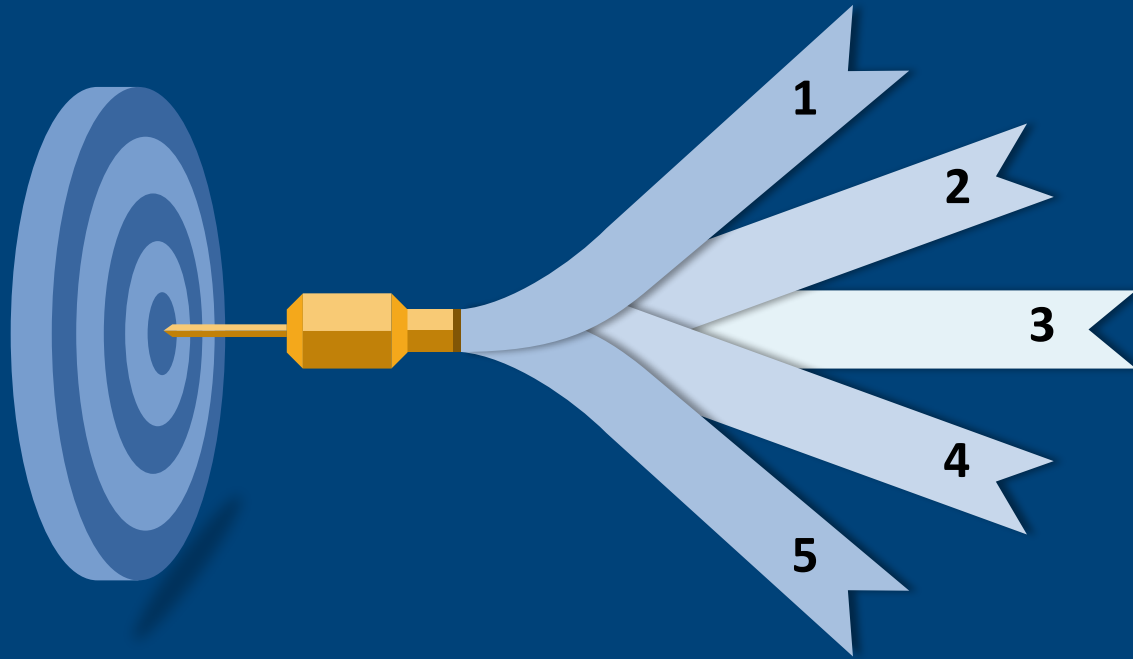
# Statutory Requirements



Public Law  
114-315 § 411

38 U.S.C. § 3693

# Objectives



Verify propriety of payments



Confirm compliance with approval criteria



Assist in understanding responsibilities and procedural requirements



Determine if there are deviations from responsibilities and requirements



Promptly and accurately correct discrepancies

# Availability of Records

## 38 U.S.C. 3690(c)

Student records and accounts must be made available for review by authorized representatives of the government notwithstanding any other provision of the law.

## Buckley Amendment (PL 93-380)

Requires student consent to release information from student records.  
Information sought in connection with an application for the receipt of financial aid is exempt.  
School records relating to VA benefits fall into the “Financial Aid” category and are exempt from the provisions of this amendment.

# Record Retention



## Student Records

Three (3) years from the end  
of last enrollment period



## Advertising

Preceding 12-month period





# Best Practices



Documents should be clearly labelled and arranged according to the VA beneficiary to be reviewed.

Original documents should not be provided; certifying officials should provide copies of all documents requested.

A certifying official or other school official should be available throughout the survey.

Certifying official should provide a detailed map showing how to reach their office and all pertinent school procedures, prior to the survey.

Certifying official should make certain all documentation requested is made available during the survey.

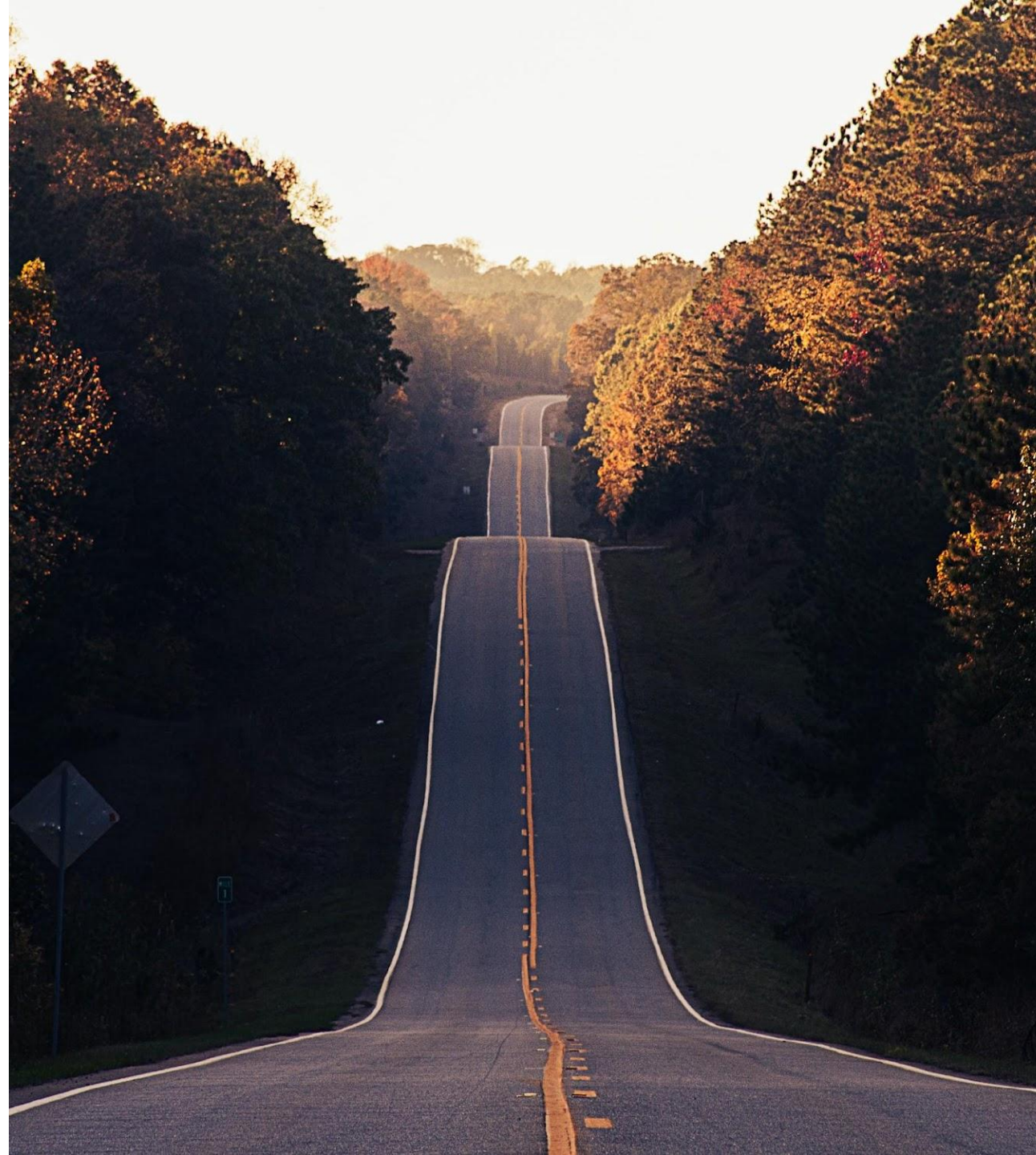
Copies should be provided on standard letter sized paper (8.5 x 11 inches), printed on one-side, and free of staples.

Certifying official should provide a legend for all codes (finance codes, course codes, etc.) and grades to the surveyor.



# Compliance Survey Roadmap

- Notification of Survey
- Entrance Briefing
- Record Review
- Exit Briefing
- Notification of Findings



# Notification of Survey

Notification Letter

Email

Phone Call



# Entrance Briefing

✓ Purpose of Compliance Survey

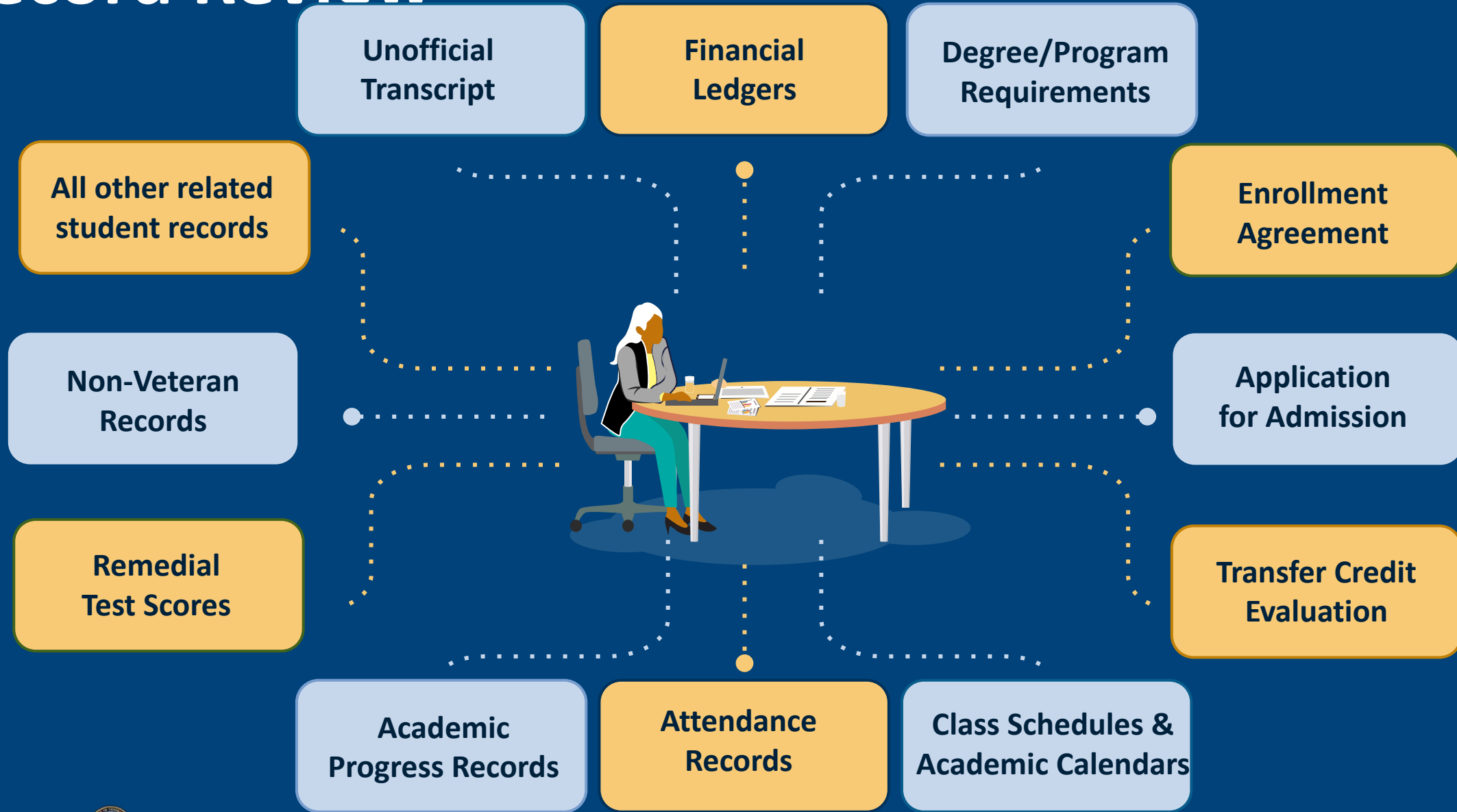
✓ Workspace Arrangements

✓ Student Interviews & Class Visits

✓ Plan for Exit Briefing



# Record Review



# Exit Briefing

✓ Discuss  
Discrepancies

✓ Questions  
and Rebuttal



# Notification of Findings



Email



Findings Letter



Corrective Actions





# Areas of Review

- All Facilities
- Non-accredited Facilities
- Vocational Flight Schools
- On-the-Job/Apprenticeship Facilities
- Additional Areas





# All Facilities



# Non-accredited Facilities

Course and Facility  
Policies Furnished to Student

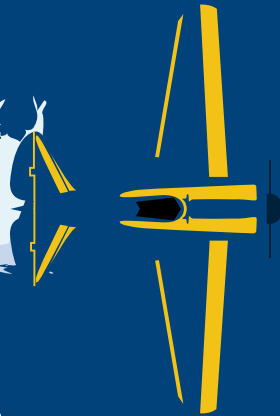
Enrollment Limitations

Pro Rata Refund Policy

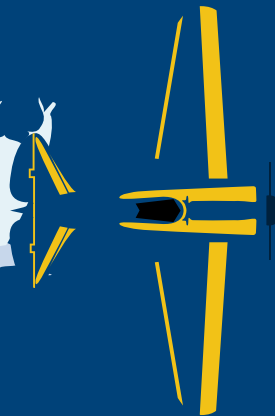


# Flight Schools

Private Pilot License



Appropriate Medical Certificate











## Cost of Training

VA beneficiaries must pay their share of the cost of training received and non-VA students must pay 100% of the cost of training received.

# Training Establishments



# Additional Areas

|   |   |   |   |
|---|---|---|---|
|    | Repeat Discrepancies                    | Advertising, Sales, or Enrollment Practices |    |
|    | Independent Study                       | Yellow Ribbon Program                       |    |
|    | Reporting Fees                          | Priority Enrollment                         |    |
|  | Reporting Graduation/Program Completion | Trademark                                   |  |

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# Resources

[Public Law 114-315 § 411](#)

[ACE Military Guide](#)

[Military Joint Services Transcripts](#)

[Community College of the Air Force](#)

[Public Law 116-315 § 1020](#)

[Buckley Amendment \(PL 93-380\)](#)

[38 U.S. Code § 3693](#)

[38 U.S.C. 3690\(c\)](#)

[38 CFR § 21.4252](#)

[38 CFR § 21.4200](#)

[38 CFR § 21.4209\(f\)](#)

[School  
Certifying  
Official  
Handbook](#)

# Questions?







# Thank You!

