

STATE APPROVING AGENCY UPDATES

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*“Great things are not done by one person. They’re done by a team of people”
–Steve Jobs*



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PARTNERSHIPS AND GOALS

NASAA continues to look for ways to partner with other organizations to improve the quality of our work and look for opportunities to assist with the demands and changes of higher education.

- ❖ SHEEO (State Higher Education executive Officers)
MOU signed in March 2022
Focusing on the relationship of oversight within the states
Potential future projects surrounding non-accredited facilities
- ❖ NASDVA (National Association of State Directors of Veteran Affairs)
Continued Partnership since 2020



JOINT PROJECTS

Mandatory Fees:

Review of mandatory fees as outlined in the SCO handbook. Working with VA to ensure the requirement and definitions are clear for all parties involved.

Web-based Catalogs:

Working on a project with NAVPA to address potential web-based catalog submissions.

Section 1015/1018 Implementation:

Continuing to work with VA towards implementing both sections and providing feedback from both the SAA and SCO perspectives.



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RISK-BASED SURVEYS

- ❖ Enacted with the passing of the Colmery Act 2017
- ❖ Updated with the passing of PL 116-315
 - Sections 1013, 1014, 1017, 1020, 1022
- ❖ NASAA worked in partnership with the Lumnia Foundation, Education Counsel, and the Department of Veterans Affairs to develop a new model.
- ❖ Training for SAAs started June 2022 and will continue through September 2022.
- ❖ SAAs will begin conducting RBS reviews under the new requirements October 1, 2022.



RISK-BASED SURVEYS

RBS Purpose:

1. Provide a mechanism for VA and SAAs to review and mitigate potential fraud, waste, and abuse at educational institutions and training facilities by utilizing data and risk factors that are outside of the normal approval, compliance, and liaison processes
2. To verify the propriety of payments of educational benefits to eligible institutions under the provisions of the laws administered by VA
3. Assure prompt action is taken through appropriate channels if risk factor is substantiated with RBS visit



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RISK-BASED SURVEYS

Legislative Risk Factors from Public Law 116-315 Section 1013:

- Rapid increase in Veteran enrollment
- Rapid increase in tuition and fees
- Complaints tracked by based on upon volume or severity
- 85/15 violations
- Veteran completion rates
- Financial stability
- Advertising and recruitment practices
- Federal and/or State Actions



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RISK-BASED SURVEYS

Other Triggers from Public Law 116-315 Section 1014:

- Heighted Cash Monitoring Two Status
- Punitive action taken by a State Agency
- Loss or risk of loss of accreditation
- Withdrawal or suspension of a facility by an SAA in a different state
- Punitive action by the Attorney General, FTC, or any other Federal department
- Advertising and recruitment practices
- Federal and/or State Actions



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RISK-BASED SURVEYS-WHAT YOU NEED TO KNOW

Compliance and Oversight include three types of reviews:

Compliance Survey: These will continue to be conducted as they have been in the past as outlined in regulation.

Targeted-Risk-Based Survey: Conducted for a specific concern or reason such as complaints to the GI Bill Comparison tool or other factors.

Risk-Based Surveys: Conducted by the SAA based on data and triggers as outlined in PL 116-315

- *A facility could face several oversight reviews within a year. For example, have a compliance survey in December, go on HCM2 in February (SAA conducts an RBS), and have complaints submitted trigger a TRBR in July.*



RISK-BASED SURVEYS-WHAT YOU NEED TO KNOW

Risk-Based Surveys will require the leadership of the facility to participate and provide the requested information.

The review will include questions about the facility, instructors, financials, advertising, marketing, lead generation, complaints, student files, and enrollment.

- ❖ Notification will be sent to the facility to submit information and documents prior to the onsite visit.
- ❖ More details and communication are slated over the next several months.
- ❖ Note: SCOs, please be sure to share with your leadership as you alone will typically not be able to supply all the requested information.



LEGISLATIVE FOCUS

- Legislative Agenda
 - Meaningful Oversight of Approved programs
 - Enhancement of approval requirements
 - Flight Improvements
 - Technical fixes to medical residencies and programs that do not charge tuition and fees.
 - 85/15 Updates (monitoring current bills released in the House and Senate)
 - Section 1015 implementation and potential concerns for accredited facilities that do not participate in Title IV.
 - Distance Education



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*"IT ALWAYS SEEMS IMPOSSIBLE
UNTIL IT'S DONE"*

NELSON MANDELA

QUESTIONS?



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