



IOWA

Department of Education

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IOWA STATE APPROVING AGENCY NEWSLETTER WINTER 2019

INTRODUCTION – To help better communicate the recent changes in the GI Bill® and the resulting changes in procedures that affect the approval of the schools, the Iowa State Approving Agency will publish periodic newsletters to update the School Certifying Officials (SCO) of changes and topics of interest. Our intention is that future newsletters will be shorter and focused on more specific subject areas. These newsletters and other documents will be available on our department web page.

Technical assistance resources available to the SCO's are the SCO Handbook, SCO Hotline, and the Iowa ELR in that order. **Contact the IA SAA or ELR for the SCO Hotline number if you do not have it.**

Colmery Section 107 Implementation – The initial upload of the identified school campus extensions has been completed. The IA SAA submitted those extension campus reported by the schools to the VA Central Office in early September. Those schools with extension campuses that were previously reported should now be able to see them listed in VA ONCE with their corresponding facility code. If for some reason your school has extension(s) that were not loaded you will need to contact our office for the approval process. The approval has to come through the State Approving Agency so that we can take the proper action and forward the information to the VA.

2020 SCO Workshops - The Spring 2020 workshops are scheduled for the following dates and locations:

- April 21, 2020 – Western Iowa Tech, Sioux City (location to TBD)
- April 22, 2020 – Kirkwood Community College, Cedar Rapids (Hotel)
- April 23, 2020 – Des Moines Area Community College, Ankeny (FFA Center)

We should have the agenda and registration process available in early March, 2020.

Principles of Excellence (PoE) – On April 27, 2012 President Obama signed an executive order establishing the PoE for educational institutions. Section 2 of this order lists 8 principles that institutions' receiving federal funds are required to comply with. Sections 3&4 address the steps to be taken in the implementation, enforcement and compliance of the PoE. The GI Bill® Comparison Tool, Feedback System and Risk Based Surveys are just some the various steps taken to ensure that the PoE are being followed. A copy of the PoE executive order is on our web page please take some time to review the executive order and make sure that there is institutional awareness of the requirements. Institution policies are reviewed during compliance and catalog approvals to ensure they meet the PoE requirements.

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Satisfactory Academic Progress (SAP) - As most of you are aware, there is an emphasis on ensuring that not only does a school's SAP policy meet approval criteria but the school's policy also clearly addresses what steps are taken if a VA benefit recipient does not meet the SAP standard. School terminology may vary but basically make sure your policy at a minimum address the following:

Academic Probation (if the school has a probation policy) – when does the student go on academic probation, how long is the probation period, what criteria must be met to continue on academic probation (no more than two terms), meet SAP standards and is taken off academic probation or what actions are taken if the student fails to meet the criteria to remain or be removed from probation. **Students on academic probation must be reported to the VA.** There should also be documentation in the student's file as to what steps the school has taken to assist the student in identifying and overcoming any obstacles that are preventing academic success.

Academic Suspension – The school policy must clearly define at what point the student's education benefit will be suspended, at which time the student enrollment cannot be certified to the VA. Although not clearly defined in regulation, the expectation is that the suspension policy should bar the student from enrolling for at least one term.

Readmission Policy – The schools SAP policy must include specific conditions a Veteran or eligible person is required to satisfy to permit recertification for VA benefits after being terminated because of unsatisfactory progress or conduct. It is presumed that upon re-admission there is reasonable certainty that the student will be able to make satisfactory progress.

(The SCO Handbook details the policies as outlined above and provides references to the applicable Federal Regulations)

APPROVAL PROCEDURES

As mentioned in the previous newsletter, due to legislative and VA policy changes there is increased emphasis on the approval oversight required of the State Approving Agencies nationwide. This requires that we do comprehensive reviews of the approved programs and policies to ensure they continue to meet approval criteria. Schools and programs will be reviewed at least every two years or whenever a new catalog is published. Policies reviews and school and program accreditation will be verified during these reviews to ensure that programs are meeting the applicable approval criteria.

COMPLIANCE SURVEY

Each year the VA Central Office determines what facilities within the state will require a compliance survey. Normally a school should expect to have a survey at least every three years. Depending on the type of school and the number of VA students, it could be every one or two years. State wide Iowa usually has about 50-60 surveys conducted each year, this would include not only schools but also OJT and Apprenticeship Training establishments.

This year the IA SAA has been assigned 25 surveys to conduct, the remainder will be conducted by an assigned VA Education Compliance Survey Specialist (ECSS) which is using assigned from the St. Louis Regional Office. In most cases these are considered routine surveys unless there was a prior survey conducted that identified problems or concerns. An additional category that will be implemented this year is what is referred to as Risk Based Surveys (RBS). These schools are identified as high risk schools due to student complaints or ELR/SAA feedback.

The IA SAA will provide 30-60 day initial notification to schools identified for a survey. That initial notification will usually include a survey date. We have found it necessary to establish a survey date due to the time constraints we have to meet. That initial notification may include a request some additional information. Approximately two weeks prior to the survey date we will provide you with a student list and detailed instructions on what information we will need to review.

Advertising and Trademark Terms of Use

As part of our approval and oversight we also will be requesting that you provide examples of any Printed promotional materials as well as conducting a review of the website. This review is conducted to verify that the school is not using any deceptive or misleading advertising. During this review we are also ensuring that if the school is using the term GI Bill® that it is being properly identified as a registered trademark of the U.S. Department of Veteran Affairs. A copy of the trademarks terms of use advisory is included with the newsletter and is also on our webpage:

<https://educateiowa.gov/adult-career-and-community-college/veterans-military-education>

Approval of non-credit/non-accredited programs offered at an IHL

A recent review by the VA and the Office of the Inspector General Office identified concerns regarding the approval of non-credit/non-accredited programs offered through an IHL, primarily this applies to those programs offered through the continued education division of the institution.

The Iowa State Approving Agency recognizes that many of these programs lead to or enhance an individual's occupational objective. Since these programs are normally operated separate from the credit side of the institution they require a separate approval process which requires that we are provided with a certified copy of the catalog listing the programs and policies in PDF format meeting the applicable approval criteria. The quarterly continuing education marketing publications do not meet the requirements for approval.

When we update the approval of the institution we will also review any currently approved non-credit programs. If proper documentation is not provided the approval will be suspended/withdrawn.

Thanks for supporting our Veteran's education benefits recipients.

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