Report to Congress
Implementing Public Law 112-249: Improving Transparency of Education Opportunities for Veterans Act of 2012
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1 Executive Summary

Public Law (PL) 112-249, Improving Transparency of Education Opportunities for Veterans Act of 2012, was enacted January 10, 2013. The law requires the Department of Veterans Affairs (VA) to develop a comprehensive policy to improve outreach and transparency to Veterans and Servicemembers, including the provision of information on Institutions of Higher Learning (IHLs).

The law defines the scope of this new policy by requiring the inclusion of the following elements:

1) Effective and efficient methods to inform individuals of Chapter 36, Educational and Vocational Counseling, provided under section 3697A of title 38.

2) A centralized mechanism for tracking and publishing feedback from students and State Approving Agencies (SAA) regarding the quality of instruction, recruiting practices, and post-graduation employment placement of IHLs that:
   a. Allows IHLs to verify feedback and address issues regarding feedback before said feedback is published;
   b. Protects the privacy of students, by not publishing the names of students; and
   c. Publishes only feedback that conforms to the criteria for relevancy that VA shall determine.

3) The merit of and manner in which an SAA shares with an accrediting agency or association information that is recognized by the Secretary of Education (20 U.S.C. 1099b) regarding the SAA’s evaluation of an IHL;

4) Description of the information relating to IHLs provided to individuals participating in the Transition Assistance Program (TAP); and

5) Effective and efficient methods to provide Veterans and Servicemembers with information regarding postsecondary education and training opportunities available.

The law requires VA to provide specific postsecondary education information as part of its effort to deliver “effective and efficient methods to provide Veterans and members of the Armed Forces with information regarding postsecondary education and training opportunities available to the Veteran or Servicemember.”

To the extent practicable, VA shall provide the information by including hyperlinks on VA’s website to other Internet websites that contain such information, including the internet website of the Department of Education (ED). The information shall be in a form that is comprehensive and easily understood by Veterans, Servicemembers, and other stakeholders.
In developing this comprehensive policy, VA is required to conduct a market survey to determine the availability of two types of commercially available, off the shelf, online tools that:

1) Allow a Veteran or Servicemember to assess whether he or she is ready to engage in postsecondary education and training opportunities and whether the individual would need any remedial preparation before beginning such opportunities, and

2) Provide a Veteran or Servicemember with a list of providers of postsecondary education and training opportunities based on criteria selected by the individual.

The law provides a process for acquiring the information listed above and the guidelines for communicating with IHLs. The law requires that this comprehensive policy be consistent with the requirements and initiatives resulting from Executive Order (EO) 13607: Establishing Principles of Excellence for Educational Institutions Serving Servicemembers, Veterans, Spouses, and Other Family Members. The law also specifies that the efforts of VA not duplicate the efforts being taken by other Federal agencies.

VA is responsible for delivering a report to Congress by April 10, 2013 to include:

1) The description of VA’s comprehensive policy to improve outreach and transparency to Veterans and members of the Armed Forces

2) The plan to implement the comprehensive policy

3) The results of the market surveys, including the Secretary’s plans to implement the tools being surveyed

This report is being submitted to meet the requirements listed above.

2 Relationship to Executive Order 13607: Establishing Principles of Excellence for Educational Institutions Serving Servicemembers, Veterans, Spouses, and Other Family Members

On April 27, 2012, President Obama signed EO 13607 to address reports of misleading or predatory behavior toward Veterans, Servicemembers and their families considering and pursuing higher education. It seeks to address questionable targeting activities, while ensuring students are better equipped with comprehensive information to make school and program choices that meet their educational goals. There is significant overlap and synergy between PL 112-249 and EO 13607.
EO 13607 directs agencies to implement and promote compliance with “Principles of Excellence” for IHLs that interact with Veterans, Servicemembers and their families. IHLs that agree to the Principles of Excellence provide meaningful information about the financial cost and quality of their school, prevent abusive and deceptive recruiting practices, and provide high-quality academic and student support services to Veterans, Servicemembers and their families.

Requirements of EO 13607:

- It requires stronger enforcement and compliance measures
  - Requires “the Secretaries of Defense and Veterans Affairs, in consultation with the Secretary of Education and the Director of the Consumer Finance Protection Bureau (CFPB), as well as with the Attorney General to create a centralized complaint system for students receiving Federal military aid and Veterans’ educational benefits to register complaints that can be tracked and responded to by the Department of Defense (DoD), VA, Justice (DOJ), ED, CFPB, and other relevant agencies.”
  - Requires “State Approving Agencies (SAAs) to alert VA to any complaints that have been registered at the state level and create procedures for sharing information about complaints with the appropriate State officials, accrediting agency representatives, and the Secretary of Education.” Similarly, PL 112-249 requires a policy description that shows “the merit of and manner in which an SAA shares with an accrediting agency recognized by the Department of Education information regarding the SAAs evaluation of an IHL.”

- It requires VA, in consultation with the DoD and ED, to “provide to prospective military and Veteran students, prior to using their benefits, streamlined tools to compare educational institutions using key measures of affordability and value through the Department of Veterans Affairs’ eBenefits portal. The eBenefits portal shall be updated to facilitate access to school performance information, consumer protection information, and key Federal financial aid documents.”

- Finally, it requires VA to, “develop a comprehensive strategy for developing Servicemember and Veteran student outcome measures that are comparable, to the maximum extent practicable, across Federal military and Veterans educational benefit programs.” Outcome measures are currently being defined by the initial cohort of Veterans for whom these outcome measures will be produced. Also, a data crosswalk that links ED’s database of schools (over 7,000 IHLs) VA’s lists of approved programs (over 30,000) is being created. The data crosswalk is a critical implementation step for both EO 13607 and PL 112-249. It will allow VA and ED to share data about IHLs across agencies, improve consumer information available to beneficiaries, and allow VA to track outcome measures that compare education benefit programs.
Much of PL 112-249 overlaps and complements the work begun in supporting EO 13607. Throughout this report, VA will identify any overlaps or synergies with EO 13607 and provide recommendations for capitalizing on them.

3 Comprehensive Policy

VA submits the following policy recommendations to execute PL 112-249’s requirement for a comprehensive policy to improve outreach and transparency to Veterans and Servicemembers.

3.1 Policy Recommendations

1) Vocational Rehabilitation and Employment (VR&E) Service will conduct an outreach campaign to raise awareness about Chapter 36 Educational vocational counseling and make the application available online.

2) Education Service will modify an existing system or build a new system to publish positive and negative feedback about IHLs on gibill.va.gov.

3) Education Service will coordinate information sharing between the SAAs and National/Regional accrediting agencies.

4) Education Service will initially utilize College Navigator to provide information regarding postsecondary education and training opportunities. The long-term approach will be a permanent centralized web application that will provide resources for beneficiaries to compare the cost of attending different schools.

5) Education Service will collaborate with VR&E to utilize CareerScope as an academic readiness tool.

3.2 Improving Chapter 36 Educational and Vocational Counseling

Title 38 U.S.C. Chapter 36 authorizes VA to provide career counseling for transitioning Servicemembers and individuals eligible for benefits under VA education benefit programs (Chapters 30, 31, 32, 33, 35 of Title 38 or Chapters 1606 or 1607 of Title 10). Counseling services include:

1) Counseling to facilitate career decision-making for civilian and military occupations,

2) Counseling to choose an appropriate civilian occupation and develop a training program, and

3) Counseling to resolve barriers that impede success in training or employment.

VA will conduct a substantive outreach campaign to raise awareness about Chapter 36 counseling services available through the VR&E program. Outreach will include information
distributed via Integrated Disability Evaluation System (IDES) sites, Transition Assistance Program (TAP) briefings, web pages, informational brochures, and public service advertising. VA will also provide the Chapter 36 counseling application electronically through eBenefits.va.gov, gibill.va.gov, and vetsuccess.gov.

3.3 Centralized Mechanism for Tracking and Publishing Feedback

PL 112-249 requires VA to develop a centralized mechanism for tracking and publishing feedback from students and SAAs regarding the quality of instruction, recruiting practices, and post-graduation employment placement of IHLs. The system shall:

1) Allow IHLs to verify feedback and address issues regarding feedback before any feedback is published
2) Protect the privacy of students by not publishing the names of students
3) Publish only feedback that conforms to the criteria for relevancy that VA shall determine

Currently, there is no mechanism for different agencies or branches of the military to share complaints. For example, if a Servicemember or Veteran files a complaint about an IHL, there is no formal process to account for it or share between agencies.

As part of implementation efforts of EO 13607, VA partnered with DoD, ED, DOJ, CFPB, and the Federal Trade Commission (FTC) to develop a centralized complaint system. Beneficiaries of military and Veteran education benefits will soon have the opportunity to submit feedback about IHLs that fail to follow the Principles of Excellence.

VA’s implementation plan for EO 13607 will allow beneficiaries to submit feedback or complaints via the GI Bill Hotline (1(888)442-4551), via an online web form located on gibill.va.gov and eBenefits.va.gov. This feedback will be shared internally with SAAs and VA personnel.

To create a centralized repository for these complaints, VA, DoD and ED will begin forwarding complaints each agency receives to the FTC’s Consumer Sentinel database. VA, DOD, and ED have been working with the FTC to streamline this submission process by standardizing the complaint intake form and the files provided to the FTC. Once these complaints reside in the Sentinel database, any law enforcement agency (federal, state, and local) that has access to

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1 “Consumer Sentinel is the unique investigative cyber tool that provides members of the Consumer Sentinel Network with access to millions of consumer complaints.” http://www.ftc.gov/sentinel/
Sentinel will also have access to those complaints. VA is working with the FTC to gain access to the Consumer Sentinel database for VA personnel.

PL 112-249 differs from the EO 13607 in three key ways:
1) PL 112-249 focuses on “feedback” (positive and negative)
2) PL 112-249 focuses on “quality of instruction, recruiting practices, and post-graduation employment placement” versus adherence to the Principles of Excellence
3) PL 112-249 requires the sharing of feedback with schools and publishes feedback publically

PL 112-249 mandates “feedback from students and State Approving Agencies,” which expands the requirements of EO 13607 to receive complaints and provides the opportunity for beneficiaries to submit positive feedback about an IHL. House Report 112-6462 describes this “centralized system” as a “complaint forum”, as it will “include assessment[s] of the quality of instruction and accreditation, recruiting practices, and post-graduation employment placement” and “students will be able to read reports from other students and SAAs about the school.” This demonstrates that the system designed to meet the requirements of PL 112-249 should solicit both positive and negative feedback.

Another key difference is that PL 112-249 includes assessment of IHLs “quality of instruction, recruiting practices, and post-graduation employment placement.” While EO 13607 prohibits fraudulent and aggressive recruiting techniques and requires disclosure of key measures of value (e.g., information about student outcomes), there are no direct requirements regarding the quality of instruction or post-graduation employment placement. It is recommended that all of these elements be combined into the design of the new feedback system.

Lastly, PL 112-249 explicitly requires IHLs to verify and address feedback before it is made public, which is not a requirement of EO 13607. It is recommended that all feedback, negative and positive, be made public after IHLs have the opportunity to verify and address such feedback to ensure a balanced approach.

\[ See \ House \ Report \ at \ GPO. \]
3.4 State Approving Agencies (SAAs) and Accrediting Agencies/Associations

PL 112-249 requires VA to address the merit of and manner in which SAAs share with an accrediting agency or association information regarding SAA evaluation of an IHL.

The purpose of PL 112-249 is to formalize the process in which SAAs communicate with accrediting agencies and associations to ensure that the school’s practices are aligned with appropriate regulations, statute, and published standards.

The United States relies on a "triad" approach for approval of IHLs. States grant the initial and continuing license (permission) to operate. Independent associations attest to the institution or specific program's overall quality (accreditation), and the federal government identifies acceptable accrediting bodies for financial aid purposes.

PL 112-249 would ensure that SAAs are important contributors to the effectiveness of this relationship through their continuing review of institutional programs. SAAs focus on the approval standards and issues which are not the concern of institutional accreditation. Title 38 CFR 21.4253(c) states that, "the State Approving Agency may use the accreditation of these accrediting agencies or associations for approval of the course specifically accredited and approved by the agency or association."

3.5 Information Regarding Postsecondary Education and Training Opportunities

VA has developed a comprehensive policy on providing education information to Veterans that includes effective and efficient methods to provide beneficiaries with information regarding postsecondary education and training opportunities available.

As specified in PL 112-249, the information that should be provided in relation to this specific requirement includes the following:

1) An explanation of the different types of accreditation available to educational institutions and programs of education
2) A description of Federal student aid programs
3) For each IHL, for the most recent academic year for which information is available:
   a. Whether the institution is public, private nonprofit, or proprietary for-profit
   b. The name of the national or regional accrediting agency that accredits the institution, including the contact information used by the agency to receive complaints from students
   c. Information on the SAA, including the contact information used by the agency to receive complaints from students
   d. Whether the institution participates in any programs under Title IV of the Higher Education Act of 1965 (20 U.S.C. 1070 et seq.)
The tuition and fees

The median amount of debt from federal student loans under Title IV of the Higher Education Act of 1965 (20 U.S.C. 1070 et seq.) held by individuals upon completion of programs of education at the IHL (as determined from information collected by the Secretary of Education)

The cohort default rate, as defined in section 435(m) of the Higher Education Act of 1965 (20 U.S.C. 1085(m)), of the institution

The total enrollment, graduation rate, and retention rate, as determined from information collected by the Integrated Postsecondary Education Data System (IPEDS) of the Secretary of Education

Whether the institution provides students with technical support, academic support, and other support services, including career counseling and job placement

The information regarding the institution’s policies related to transfer of credit from other institutions, as required under section 485(h)(1) of the Higher Education Act of 1965 (20 U.S.C. 1092(h)(1)) and provided to the Secretary of Education under section 132(i)(1)(V)(iv) of such Act (20 U.S.C. 1015a(i)(1)(V)(iv))

Recommendations included in this report will ensure the comprehensive policy is consistent with the requirements and initiatives resulting from EO 13607 and does not duplicate the efforts being taken by any federal agencies.

VA will offer more resources that provide education information to Veterans. Per PL 112-249, VA will provide hyperlinks on VA websites, linking interested parties to specific existing websites that provide consumer information about schools, including ED’s College Navigator and College Scorecard. The TAP curriculum will also provide Servicemembers with information regarding how to access and utilize this information. Specifically, the Benefits I briefing includes a one-hour briefing regarding education benefits and covers eligibility, specific monetary benefits, limitations of benefits, school selection – including the avoidance of predatory schools – and an emphasis on the use of Chapter 36 counseling to assist in identifying career goals. In addition, DoD’s Education Track provides comprehensive guidance to participants in developing academic goals, selecting training facilities, and succeeding to the point of graduation. VA’s Technical Track provides tailored assistance for technical training, including college degrees leading to employment in technical fields such as information technology, medical technology, and other high-demand occupations.

Currently, beneficiaries visit multiple agency websites to understand the scope of payments and assistance available from their Post-9/11 GI Bill, VR&E, or other VA educational benefits. To enhance transparency and fulfill the requirements in EO 13607, VA is in the process of developing streamlined tools to compare educational institutions, with a focus on key measures of affordability (e.g., the institution’s cost of attendance and what the Post-9/11 GI Bill, VR&E, and other VA educational benefits will fund at a particular school), as well as the value gained.
from attendance at specific educational facilities (e.g., graduation rates, default rates, and average federal student loan debt).

VA’s Comparison Tool is still in the development phase, with the first phase of delivery tentatively scheduled for October 2013. VA will develop an interim approach with ED, which includes a Benefit Estimator tool with College Navigator hosted on gibill.va.gov and eBenefits.va.gov. The first phase of development of the Comparison Tool will allow a user to:

1) Estimate educational benefits for programs like the Post-9/11 GI Bill
2) Estimate cost of attendance for the program:
   - Basic Information about the IHL
   - Public, Private, or For-Profit
   - Title IV eligible
3) Identify key measures of value at the IHL level:
   - Graduation rate
   - Retention rate
   - Cohort default rate
   - Median federal student loan debt

The second phase of the Comparison Tool, tentatively scheduled for April 2014, will allow a user to:

1) Calculate personalized Post-9/11 GI Bill, VR&E, and other educational benefits
2) Compare multiple schools at the same time
3) Display Veteran and Servicemember-specific outcome measures for each IHL (an EO 13607 requirement)

As required by PL 112-249, separate tools will also provide:

1) Explanations of the different types of accreditation
2) Descriptions of federal student aid programs
3) Identify for each IHL:
   - Name and contact information of the accrediting agency
   - Name and contact information for the SAA
   - Support services (technical, academic, career, and job placement)

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3 Displaying key measures of value and affordability can be done several ways, either by displaying the publically available Department of Education data on the tool itself, providing hyperlinks to this information, etc. Please see implementation Section 4 for further discussion.
Policy on transfer of credit

EO 13607 requires signatories of the Principles of Excellence to:

1) “inform students who are eligible to receive Federal military and veterans educational benefits of the availability of Federal financial aid,” and
2) “obtain the approval of the institution’s accrediting agency for new course or program offerings before enrolling students in such courses or programs, provided that such approval is appropriate under the substantive change requirements of the accrediting agency.”

Neither of the requirements noted above fulfill the disclosure requirements in Public Law 112-249.

Lastly, while EO 13607 requires VA to develop “streamlined tools to compare education institutions using key measure of affordability and value” and facilitate a Veteran’s “access to school performance information and consumer protection information,” PL 112-249 only requires VA to provide hyperlinks on VA websites to other websites that contain the same information. However, PL 112-249 does require VA to ensure it is providing this information “in a form that is comprehensible and easily understood.”

4 Implementation Plan for PL 112-249

4.1 Improving Chapter 36 Educational and Vocational Counseling

VR&E Service will address identified gaps regarding the usage of Chapter 36 counseling and will articulate steps that VA’s TAP briefing coordinators, Military Services Coordinators (MSC), IDES counselors, and other VA outreach staff may take to expand its use. The outreach efforts to raise awareness about Chapter 36 Educational and Vocational Counseling will be an ongoing effort. Specifically, VR&E will expand outreach efforts to:

- Transitioning Servicemembers (using their Post-9/11 GI Bill or other educational benefits to make the best decision concerning their pursuit of education)
- Veterans on college campuses that do not currently have a VetSuccess on Campus (VSOC) counselor

This will be accomplished through the following steps to improve internal access and awareness about Chapter 36 counseling:

1) Emphasize the importance of utilizing Chapter 36 counseling services during internal meetings with VA outreach staff and regional office staff
2) Encourage VA personnel to conduct grassroots outreach through email, personal contacts, meetings, and briefings

3) Ensure VA’s TAP briefing coordinators provide robust information about Chapter 36 counseling and include guided assistance to apply for this benefit

4) Provide materials related to Chapter 36 counseling to all 56 VA regional offices, 153 VA medical centers, and other VA entities (e.g., Vet Centers, National Cemeteries, and VHA mobile sites)

5) Coordinate with VA’s Office of Information and Technology to prioritize the addition of the Chapter 36 counseling application to the VONAPP website

6) Provide training to VA personnel associated with outreach efforts, ensuring their ability to assist eligible participants who wish to apply for Educational/Vocational counseling benefits online

7) Encourage Coming Home to Work Coordinators, IDES Counselors, and MSC staff to collaborate with the Family Assistance Center and Family Support Centers on military installations to facilitate the provision of Chapter 36 counseling services to Veterans, Servicemembers, and eligible dependents as part of their support services

VR&E Service will take the following steps to improve external access and awareness about Chapter 36 counseling:

1) Coordinate with VA’s Office of Public and Intergovernmental Affairs to disseminate promotional products to local and state-wide entities

2) Collaborate with DoD, DOL, ED, other federal agencies, and Veterans Service Organization (VSO) partners to develop and implement external communications strategies

3) Ensure Chapter 36 counseling service information is marketed on the main VA pages, and easily accessible links to the Chapter 36 counseling application are available online

4) Utilize social media such as Facebook, UStream, and Twitter to promote Chapter 36 counseling services

5) Coordinate with VA, DoD, and DOL to share materials at regional/local conferences and events so that state and local areas will have access to Chapter 36 counseling information for their use at local events

6) Educate and provide outreach materials to other federal agencies (i.e. DOL, DoD, and ED), VSOs, One-Stop Career Centers, State Workforce Investment Boards, Local Workforce Investment Boards, Disabled Veterans’ Outreach Program, and Local Employment Representatives

VR&E’s plan will increase awareness and inform eligible participants about Chapter 36 counseling services, including how to determine an appropriate degree program and the education benefit program most appropriate for participants’ individual circumstances. The
outreach plan requires coordination among regional offices, schools, SAAs, and VSOs. VR&E Service will develop a more detailed campaign timeline by May 2013.

4.2 Centralized Mechanism for Tracking and Publishing Feedback

To capitalize on the work completed for EO 13607 and to successfully implement PL 112-249, Education Service will:

1) Combine the elements for a complaint and feedback system identified in EO 13607 and PL 112-249 into one system,
2) Identify available resources to support this effort, and survey and seek best practices from other federal, state, or local agencies that accept and publish feedback,
3) Solicit input from key stakeholders, such as but not limited to SAAs and VSOs,
4) Expand the current complaint intake form to include additional feedback and assessments of “quality of instruction, recruiting practices, and post-graduation employment placement,”
5) Work with DoD, ED, DOJ, CFPB, and FTC to ensure that the Principles of Excellence centralized complaint system is viable,
6) Draft policies for sharing feedback from the SAAs,
7) Develop a mechanism to allow IHLs to verify and address issues,
8) Propose and seek public comment on criteria for feedback that would be made public,
9) Modify an existing system or build a new system to publish feedback on gibill.va.gov,
10) Collect and publish the feedback.

To provide more detail on the implementation steps for the centralized feedback system noted above, VA’s Education Service is working to:

- Identify available resources to support this effort, including funding for the EO 13607 Complaint System. The Congressional Budget Office estimated that implementing the comprehensive outreach plan and feedback system in PL 112-249 would cost $7 million between the FY 2013-2017 period, with an initial outlay of $3 million.

- Survey and seek best practices from other federal, state, or local agencies that accept and publish feedback. Until the passage of PL 112-249, the EO 13607 Enforcement Working Group had only been tasked with building a system for accepting complaints. Education Service will also survey and seek best practices from other agencies that incorporate not only accepting feedback, but also incorporate publishing the feedback.
Solicit input from key stakeholders about the centralized feedback system. Education Service, in conjunction with the EO 13607 Enforcement Working Group, will meet with these representatives to discuss implementation of the centralized feedback system.

Expand the EO 13607 complaint intake form to include assessments of “quality of instruction, recruiting practices, and post-graduation employment placement,” as mentioned previously. The purpose of this new expanded form is to allow individuals to give feedback, in the form of both complaints and positive reviews of IHLs. The expanded feedback form will be vetted by key stakeholders, the EO 13607 Enforcement Working Group, and the PL 112-249 Working Group.

Ensure the work on the EO 13607 requirement to build a centralized complaint system is advantageous to the user. The EO 13607 Enforcement Working Group has spent considerable time working to ensure that the complaint intake form is easily uploaded to Consumer Sentinel.

Draft policies for SAAs to share feedback with this centralized feedback system. Program reviews and other evaluations by SAAs are generally not made publicly available. Careful thought will be spent developing policies and procedures on what information should be forwarded into the system and, subsequently, be made public.

Develop a mechanism and/or system for IHLs to verify and address issues submitted through the centralized feedback system similar to CFPB’s consumer response system. The system will automatically forward feedback to the institution and will track responses. Education Service will also develop supplemental policies on how IHLs will verify each complaint and propose and seek public comment on criteria for feedback that would be made publicly available.

Modify an existing system or build a new system to publish this feedback and promote its availability to the public, in the final steps.

4.3 State Approving Agencies and Accrediting Agencies/Associations

Education Service and SAAs will establish contact with all national/regional accrediting agencies associated with the IHLs, which are approved by the SAA to include all state agencies that determine if an IHL is operating legally in a state. Currently, SAAs interact with accrediting association and agencies in an informal manner. New policy will provide a uniform manner in which SAAs will share information with these accrediting and state agencies. SAAs will be provided with the link to ED.gov, which identifies all national, regional, and specialized accrediting agencies. SAAs will begin information-sharing to National/Regional accrediting agencies by October 2013.
4.4 Information Regarding Postsecondary Education and Training Opportunities

To improve the availability of information regarding postsecondary education and training opportunities, Education Service will:

1) Identify available resources to support this effort, including funding web tool development and maintenance (the additional reporting requirements in PL 112-249 were not accompanied with any funding)
2) Conduct market surveys required by PL 112-249
3) Complete the data crosswalk
4) Develop policies and standard operating procedures (SOPs) to regularly update the crosswalk
5) Design, build, and launch an interim Benefit Estimator and host College Navigator
6) Develop policies and SOPs to ensure the tool is regularly updated
7) Publish and/or link to any information required by PL 112-249
8) Design, build, and launch a Comparison Tool
9) Finalize, collect, and publish outcome metrics specifically related to the Veteran and Servicemember student population

Education Service will solicit input from key stakeholders about the Comparison Tool and other key pieces of information required under PL 112-249.

Education Service will develop policies and SOPs to regularly update the crosswalk. One challenge is that new schools are opening every year, while older schools move, change names, and even buy other schools on a regular basis. Any data crosswalk will immediately become dated after being completed if there is no system in place to maintain and update the crosswalk. This will likely require Education Service to request School Certifying Officials to update school information annually, to include the school IPEDS and ED’s Office of Postsecondary ID numbers, if available.

Education Service will publish and/or link to any information required by PL 112-249 not already incorporated in the GI Bill Comparison Tool (e.g., information about accreditations).

4 See Appendix A for market survey results.
Education Service will identify the most effective and efficient way to publish and link to information not already being presented. It has been determined by ED and VA that institution-level data policies on transfer of credit for Veterans are not currently being collected. Therefore, VA will work with its agency partners, especially ED, to secure any required information from IHLs.

Education Service will update the information provided in its “Choosing a School” guide. The guide is a resource for Veterans, Servicemembers, and eligible dependents. Education Service will strengthen the existing guide to help students become more accountable and better informed, help students achieve success in their programs of study and career, improve return on investment to the taxpayer, and demonstrate VA’s commitment to student success.

Education Service will finalize, collect, and publish outcome metrics. As per the EO 13607, VA, in coordination with DoD and ED, will finalize the development of Servicemember and Veteran student outcome measures that are comparable, to the maximum extent practicable, across federal military and Veterans educational benefit programs. Education Service tentatively plans to begin collection of these outcomes August 2013, with initial publication in April 2014.

Education Service will provide all data identified in EO 13607 and PL 112-249 in a Comparison Tool hosted on gibill.va.gov, VetSuccess.gov, and eBenefits.va.gov by April 2014.

5 Market Surveys

VA conducted two market surveys of commercially available off-the-shelf online tools that provide either academic readiness or a listing of providers of postsecondary education and training opportunities.

5.1 Data Gathering

VA began this effort by establishing a checklist of data requirements necessary in selecting an online tool. As a result, a criteria matrix was created with four key features consistent with PL 112-249. These features include: Online tool, Payment Online, Recognized for 2- or 4-year admissions, and Complaint procedures. For the purpose of this survey, training opportunities, as referenced in PL 112-249, has been excluded in order to limit the scope of the investigation. However, all of the computerized tools reviewed for academic purposes have also been used in the industry for delineating preparedness for the civilian workforce and the military.

Information was gathered, compiled, and analyzed by subject matter experts from VA, ED, and CFPB. Findings from the data-gathering phase were evaluated and prioritized using the checklist. A total of 20 online tools were identified and reviewed. Of the 20 that were reviewed, three were used by other federal agencies (i.e. ED and DOL) and one was an internal VA tool. The results of this survey are in Appendix A.
5.2 Results

5.2.1 Survey 1 - Academic Readiness

Based on the market survey results, VA determined that CareerScope is the preferred commercially available off-the-shelf online tool that provides an assessment of academic readiness. For the purpose of vocational and educational planning, CareerScope is an evaluation tool already used by VR&E’s Vocational Rehabilitation Counselors to help determine the academic readiness and other educational/vocational services needed for a Veteran, Servicemember, or dependent. Currently, VR&E Service owns a license to utilize the system. Education Service will either utilize the existing contract vehicle or develop a new contract vehicle to obtain additional licenses to increase VA’s use of the CareerScope tool. VA anticipates offering the CareerScope tool to future students by August 2013. This assessment tool is also widely used by career and guidance counselors in IHLs for the purposes of educational planning. This commercially available online product allows the Veteran, Servicemember, and/or dependent to easily access and self-administer the online tool.

Kuders College & Career Planning Counseling Services and Petersons OASC were ranked in second and third place among the commercially available off-the-shelf online tools. The Kuders College & Career Planning Counseling Services and OASC tools are currently utilized during the mandatory Transition Assistance Program (TAP) for transitioning Servicemembers. They are both tools widely used for academic readiness for Servicemembers during their transition from military to civilian life. Both Kuders and OASC are used at many IHLs to determine both career and educational goals. Kuders offers a career and transition system specifically designed for the Armed Forces during the military to civilian transition process. The results of this assessment help Veterans and Servicemembers choose a major and career that suits their interest and skills. OASC is designed for individuals in the Armed Forces who want to build their reading comprehension, vocabulary, and math skills to pass their exams, advance their careers, or continue their education.

5.2.2 Survey 2 – Listing of Postsecondary Education Opportunities

VA reviewed eleven different online tools that compile the latest information on IHLs and education training opportunities for Servicemembers and Veterans. Many online tools provide much of the required information, but none of the websites provided all the data required in EO 13607 and PL 112-249. As a result, VA will consider either utilizing two sites that together meet all criteria; collaborating with a site that meets most criteria to add additional
information; or building a tool that aggregates information from existing websites to provide all data hosted on gibill.va.gov\(^5\) and eBenefits\(^6\). This tool must compare educational institutions based primarily on the latest data from IPEDS, the core postsecondary education data collection program for the National Center for Education Statistics.

The recommended interim solution for the Comparison Tool includes VA working with ED to create a Benefit Estimator tool with College Navigator hosted on gibill.va.gov and eBenefits.va.gov.

The long-term approach for the Comparison Tool will be launched with additional enhancements to include all required Education Service calculation factors by April 2014. This will be a permanent centralized web application that will provide a resource for beneficiaries to accurately and conveniently compare the cost of attending different schools. See Section 4.4 for more.

It will be necessary to integrate and modify the existing Web-Enabled Approval Management System (WEAMS), which contains VA’s lists of approved programs, into the Comparison Tool. Currently, WEAMS is available via the gibill.va.gov website. Through WEAMS, students are able to search by institution, program type (IHL, non-college degree, on-the-job training/apprenticeship, correspondence, flight, and license and certification programs), Yellow Ribbon school, or by country or state. The available data displayed provides institution name, programs available, school officials, Basic Housing Allowance rate, and Yellow Ribbon status. Availability will also be expanded to include links from the eBenefits and VetSuccess.gov websites.

WEAMS has the potential to provide institution-specific data for terms, maximum fee per credit, and maximum fee per term, but it will need to be modified and enhanced to provide additional measures of Value and Affordability for integration into the GI Bill Comparison Tool, to include:

- Principles of Excellence Participant
- Yellow Ribbon Participant
- Yellow Ribbon Scholarship

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\(^5\) [www.gibill.va.gov](http://www.gibill.va.gov) receives over 2 million site visits per year and is the authoritative source for information about VA’s education benefit programs.

\(^6\) [www.ebenefits.va.gov](http://www.ebenefits.va.gov) is a one-stop shop for benefits-related online tools and information for Wounded Warriors, Veterans, Service members and their family.
• Number of Veterans Attending
• Graduation Rate
• Retention Rate
• Federal Student Loan Default Rate
• Average Federal Student Loan Debt
• Eligible for Title IV Funding (Federal Student Aid)
• Average Cost of Attendance
• Average Tuition / Fees
• State Approving Agency
• Regional Processing Office Jurisdiction
• Accrediting Agency
• Veterans Outcomes (to be developed)

6 Summary

VA will utilize Chapter 36 counseling services, TAP assessments, Career Scope, and College Navigator to develop and employ the effective and efficient methods required to provide educational and vocational counseling, determine academic readiness, and provide information about postsecondary education and available training opportunities. VA will be able to provide key milestone dates for implementing PL 112-249 after funding has been approved. VA will also implement the centralized online tools to allow for tracking and publishing feedback from students and SAAs. These policies and tools will further enhance VA’s ability to execute PL 112-249 and provide the information and transparency needed for Veterans and Servicemembers to gain a quality education.
Appendix A – Market Survey Results
Implementing Public Law 112-249: Improving Transparency of Education Opportunities for Veterans Act of 2012
# Market Survey Results

<table>
<thead>
<tr>
<th>Online Measures of Academic Readiness</th>
<th>Description (Including Subjects Assessed)</th>
<th>Key Features Consistent with PL 112-249</th>
<th>Considerations for Recommendation of Priority</th>
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</thead>
<tbody>
<tr>
<td>---</td>
<td>---</td>
<td>Online tool, Payment online, Recognized for 2- or 4-year admissions, Complaint Procedures, Market Survey</td>
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</tr>
</tbody>
</table>

## Markey Survey 1: Academic Readiness

1. **CareerScope**

CareerScope® enhances the career and educational planning process for those in education, workforce development, corrections, vocational rehabilitation, and related fields by measuring both interest and aptitude through valid and reliable assessment tasks.

**Enhances career and educational planning** including career development portfolios, transition plans, individualized educational plans (IEP), and employee training and retention plans.

- ✓
- ✓
- ✓

### Academic Readiness

The CareerScope is designed to be easy to complete, administer, and score. It’s self-administered; and can be completed in 60 minutes or less. The CareerScope Incorporates physical performance scores including motor coordination and dexterity. It is effective for diverse audiences. Accommodation options include audio delivery, English with Spanish text, and untimed delivery. The system is widely used in schools, job training programs and in rehabilitation agencies and has been validated against widely recognized criteria.

**Price:** Costs are based on the number of licenses purchased.

**Website:** [http://www.vri.org/products/careerscope-v10/benefits](http://www.vri.org/products/careerscope-v10/benefits)

**Advantages:**
- This assessment is not timed, and the participant can stop and start at any point.
- Provides the participant with a detailed summary and a copy.
## Market Survey Results

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<td></td>
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<tr>
<td>2. Peterson's Online Academic Skills Course</td>
<td>(OASC) for Military Success is designed for individuals in the U.S. military who want to build their reading comprehension, vocabulary, and math skills to pass their exams, excel in their jobs, advance their careers, or continue their education.</td>
<td>✓</td>
<td>N/A</td>
</tr>
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</table>

**Online Tool**: Is the tool offered online

**Payment Online**: Is a payment required to use the tool

**Recognized for 2/4 year admissions**: Is the online tool recognized as part of the admissions process for postsecondary IHLs

**Complaint Procedures**: Does the tool provide any information to submit a complaint

**Market Survey**: Indicates which survey the online tool applies to

Disadvantages:
- Requires licenses for every site location.
- Limited to certain function level (not equipped for persons with severe disabilities or visually impaired)
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| 3. College & Career Planning Counseling Services | College & Career Planning Counseling Service provides evidence-based assessment, education planning, and career guidance tools and resources. 
Author: Kuder | √                                      | √              | √                                      | Academic Readiness          |                          |

- Free to all DoD civilian employees, military members (Active Duty, Reserves and National Guard), and their family members
- Designed for individuals in the US military
- Completely online; Accessible from any internet-connected computer

**Disadvantages:**
- Focuses primarily on math and verbal skills

Postsecondary institutions do not use the results of this assessment to determine if remedial training is needed

**Advantages:**
- Assessment is designed for the US Military to assist during the military to civilian transition process

**Website:** [http://www.dantes.kuder.com/](http://www.dantes.kuder.com/)

**Author:** Kuder

**Kuder offers a Career and Transition System, specifically designed for the US Military. This system is a comprehensive online resource to help Veterans and Service members learn skills and work values to build a career plan.**

**Website:** [http://www.dantes.kuder.com/](http://www.dantes.kuder.com/)

**Advantages:**
- Assessment is designed for the US Military to assist during the military to civilian transition process
## Market Survey Results

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### Market Survey 2: Providers of Postsecondary Education

1. **College Navigator**

   The College Navigator is a free consumer information tool designed to help students, parents and others get information about 7,000 postsecondary institutions in the US and other jurisdictions. This tool consists primarily of the latest data from the Integrated Postsecondary Education Data System (IPEDS), the core postsecondary education data collection program for NCES – the National Center for Education Statistics.

   **Author:** National Center for Education Statistics

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**Advantages:**

- Has 4 of the 10 items listed in PL 112-249
- There is no cost to the Veteran or Servicemember to access this information.
- Data is provided to the College Navigator by the IPEDS.

**Disadvantages:**

- College Navigator allows students to research one or more schools based on the criteria they selected. This site displays programs offered, retention/graduation rates, accreditation, tuition and fee costs and available aid at each institution.
- This site also allows users to compare up to four different institutions, including community colleges, four-year colleges and technical schools.

**Website:** [http://nces.ed.gov/collegenavigator/](http://nces.ed.gov/collegenavigator/)

### Online Tool:
Is the tool offered online

### Payment Online:
Is a payment required to use the tool

### Recognized for 2/4 year admissions:
Is the online tool recognized as part of the admissions process for postsecondary IHLs

### Complaint Procedures:
Does the tool provide any information to submit a complaint

### Market Survey:
Indicates which survey the online tool applies to
## Market Survey Results

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| 2. The College Score Card             | The College Score Card is an interactive online tool which highlights key indicators about the cost and value of institutions across the country to help students choose a school that is well-suited to meet their needs, priced affordably, and is consistent with their educational and career goals. The College Scorecard is part of President Obama’s continued efforts to hold colleges accountable for cost, value and quality. **Author:** U.S. Department of Education | ✓ | N/A | Providers of Postsecondary Education | The College Scorecard, which is accessed through the White House website, is a planning tool that assists users in choosing a school by providing a snapshot of an institution’s affordability and value. This tool allows the user to search for a school by name or based on individual preference. The results focus on cost, graduation, student loan debt and earning potential. **Website:** [http://www.whitehouse.gov/issues/education/higher-education/college-score-card](http://www.whitehouse.gov/issues/education/higher-education/college-score-card) **Advantages:**  
• Provides a snapshot of the school’s affordability and value  
• There is no cost to the Veteran or Servicemember to access this information. **Disadvantages:**  
• Does not provide all the information outlined in P.L. 112-249 |
| 3. College Affordability              | The College Affordability and Transparency Center (CATC) was designed by the U.S. | ✓ | N/A | Providers of Postsecondary Education | CATC is a central point for the College Scorecard, College Navigator, 90/10 Information, Net Price Calculator Center, |

**Online Tool:** Is the tool offered online  
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<td>and Transparency Center</td>
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