

**Education Business  
Process Re-Engineering  
Community of Practice**

Report for the Director,  
Education Service  
April 25, 2002

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## **Executive Summary.**

### **Background and Overview**

In 2000, the former Director of the Veterans Benefits Administration Education Service, Ms. Celia Dollarhide, directed that a team be formed to reengineer the Education Service business line process of Montgomery GI Bill program administration. Previous reengineering efforts had been directed at policy and internal business line processes. A second reengineering effort had primarily focused on field human resource requirements. Ms. Dollarhide sought to extend Montgomery GI Bill reengineering efforts to include the views on partners and stakeholders in delivering VA education benefits including State Approving Agency representatives and school officials. Initially she directed that Ted Van Hintum, Assistant Director for Program Management within VA's Education Service and Mike Seymour, Director of the Okalahoma State Approving agency be co-leaders of an informal reengineering team. Shortly after the team's establishment, Dave Guzman, Interim Registrar at Washington State University and current President of the National Association of Veterans Program Administrators (NAVPA) was invited to become a third co-leader of the team.

### **Summary of Activities**

A series of four meetings were held commencing with an informal meeting during the National Association of State Approving Agencies (NASAA) annual conference in Pittsburgh, Pennsylvania in July 2000. During this meeting Ms. Dollahide's views for reengineering the Education business process as outlined in a paper entitled "A Vision for Reengineering the Education Program" (Appendix A) were discussed. In attendance were the two-team co-leaders at that time representing the VA and SAA's, other SAA officials, and school officials representing Pennsylvania State University and Embry-Riddle Aeronautical Institute. A complete list of team members is included in Appendix B. Following the first meeting, monthly conference calls were conducted and three additional meetings were held concluding with the final meeting of the team in February 2002 following the NASAA midwinter meeting in Washington, DC.

### **Recommendations.**

During the course of meetings and monthly conference calls, a number of recommendations were developed to reengineer the education business line process. These recommendations are listed on the following page and are discussed in detail in Section IV of this report.

## **Final Recommendations**

### **POLICY**

Expand the definition of a program of education to include any training necessary to meet and retain “Career Goals” including continuing professional education.

Eliminate the need for students to provide mitigating circumstances.

**Eliminate the requirement for the school to report to the VA the amount of credit allowed for previous training or experience.**

Revise practical training to include non-accredited courses and clarify approval criteria.

**Simplify training time measurement decisions.**

### **PEOPLE AND PROCESS**

**The highest levels of VA should work with counterparts in DOD and DOL to establish formal and regular lines of communication and oversight to provide the cooperation necessary to adequately inform active duty service members of their VA educational benefits before separation from service.**

**The VA should aggressively pursue legislation to reinstate the Veterans Education Outreach Program (VEOP).**

**VA should offer the Roster of Names and Addresses (RONA) free of charge to schools and State Approving Agencies requesting it for use as a tool to recruit students for programs approved for veterans.**

VA should aggressively and completely implement the initiatives described in the “Report on Education Outreach” dated June 27, 2000.

**VA should advertise in letters and pamphlets, and provide a link via its website, to databases listing those programs approved for the use of VA education benefits.**

**Responsibility for program approval should remain with the SAAs.**

**Where possible, allow a combination of VA and SAA responsibility for compliance surveys.**

**Develop training manuals, activities, and communication vehicles to assist all veteran program administrators to stay abreast of processing requirements, technology and regulatory changes.**

**VA should develop a public awareness-training package for college and university leadership.**

## **TECHNOLOGY**

**A Chief Information Technology Officer in the Education Service and in each RPO Education Division is needed to coordinate education technology initiatives.**

**A comprehensive review of TEEs needs to be conducted to ensure it addresses all issues that field VA staff, SAAs and schools believe needs to be considered**

**A web portal expanding upon the [www.gibill.va.gov](http://www.gibill.va.gov) web site and providing “one-stop shopping” to veterans, schools and SAAs should be developed**

VBA should invest in the development of an on-line approval system that will incorporate all of the components of the current OLAF system and LACAS systems. This approval system should be web based and provide for access to schools, veterans, and the general public.

VACert needs to be transported to an Internet based application and its use should be mandatory if a facility with 10 or more VA students wishes to participate in the training of veterans and their dependents

## Education Community of Practice

### Communities of Practice

Organizations today, including the U.S. government must find ways to do *more* with *less* because organizations have finite or limited resources. One way to leverage existing resources is through the judicious use of social or work networks, otherwise known as communities of practice (CoPs). In the past several years, communities of practice are receiving more attention as a way to improve productivity (MORE), improve service (BETTER), reduce cycle time (FASTER), reduce cost (LESS), and leverage resources (KNOWLEDGE & PEOPLE). Basically communities of practice are “groups of people informally bound together by shared expertise and passion for a joint enterprise—engineers engaged in deep-water drilling, for example, consultants who specialize in strategic marketing, or frontline managers in charge of check processing at a large commercial bank.”<sup>1</sup> Communities of practice can and do cut across organizational boundaries and if properly nurtured by the formal organization produce results and employee satisfaction.

The Veterans Benefits Administration has experimented with this approach, including the Education Service. And a number of organizations have taken communities of practice seriously and demonstrated significant results like the Ford Motor Company with its Best (Proven) Practice Replication Process or Eureka of Xerox with its 25, 000 service representatives scattered over the Earth. Xerox claims 100 million dollars in cost avoidance with Eureka and Ford over 1 billion dollars with its Best (Proven) Practice Replication Process<sup>2</sup>.

Ford’s Best Practices Replication Process started in 1995 when a Ford executive visited Ford factories in Europe and discovered that some European processes could be used in the U.S. as well as vice versa. In another part of the company a reengineering group, the “Rapid Actions for Process Improvement Deployment”, was working on deploying best practices throughout the company. These two groups eventually merged to form the Best Practices Replication Process.

Ford’s Best Practices Replication is a process that facilitates the collection, approval and sharing of proven best practices. A CoP, composed of generally two people from each Ford factory, not managers, submit best practices, test best practices from other sites, and report back to the CoP their adoption, adoption in part, or rejection of a particular best practice.

Since inception of the Ford Best Practices Replication Process over 2800 high value best practices have resulted in savings of \$950 million. Twenty CoPs have been launched to share best practices. Patents have been applied for software developed by Ford to share best practices and the process has been licensed to other corporations.

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<sup>1</sup> SOURCE: pages 139 of article, Communities of Practice: The Organizational Frontier, *Harvard Business Review*, Volume 78, Issue 1, January/February 2000.

<sup>2</sup> SOURCE: article by Thomas A. Stewart, pages 139-140 of *Fortune* dated November 27, 2000.

## **Education Business Process Reengineering Community of Practice**

Former Education Service Director Celia P. Dollarhide directed that a team composed of VA, SAA and school officials be created to reengineer the education business line process. This reengineering working group was the third of such efforts that Ms. Dollarhide had directed. The first effort, or BPR I as it was known, primarily focused on policy and processes that could be streamlined in order to improve administration of the Montgomery GI Bill education assistance program. The second effort, BPR II, was directed at field human resource changes including moving from a claims examiner position to a case manager position in the four Regional Processing Offices. The current Business Process Reengineering effort expanded focus to include not only VA but State Approving Agencies and school representatives as well. Its purpose, as stated in Ms. Dollarhide's "A Vision for Reengineering the Education Program" (Appendix A) was to "provide seamless service in a rapidly evolving technological environment" by VA, schools and State Approving Agencies working in concert to complement one another's activities in providing Montgomery GI Bill education benefits to veterans.

The first meeting of the team was held during the National Association of State Approving Agencies annual conference in July 2000 at Pittsburgh Pennsylvania. Prior to the first meeting, Ms. Dollarhide had directed that Ted Van Hintum, Assistant Director for Program Management in the Education Service, and Mike Seymour, Director of the Oklahoma State Approving Agency be designated as co-leaders of the team. Shortly after the first meeting, Dave Guzman, Interim Registrar at Washington State University and current President of the National Association of Veteran Program Administrators, was also invited to become a third co-leader of the team.

Attending the first meeting were the then two co-leaders, VA staff representing the Philadelphia VA Regional Office and Insurance Center, a number of other SAA representatives who had expressed an interest in being a part of the team, and school representatives from Pennsylvania State University and Embry-Riddle Aeronautical Institute. Initial discussions focused on VA's reengineering efforts including TIMS, TEES, WAVE and VONAPP. Discussion then moved on to Ms. Dollarhide's desire to involve SAAs and schools in an overall reengineering effort.

Upon conclusion of the initial meeting it was agreed to hold monthly conference calls to report out status and progress of various ongoing initiatives within the VA. Monthly calls over the remaining summer and fall months of 2000 were conducted. In addition, a number of additional school and SAA members were invited to join the team because of their particular interests or as a representative of a particular school constituency. Finally, it was recommended that the services of a facilitator for the team be obtained in order to keep the team focused and moving forward. A complete list of team members is included in Appendix B of this report.

After a number of conference calls it became apparent that for the team to move forward a face-to-face meeting would be required. A second meeting was held at VA headquarters in Washington, DC in January 2001. During the course of this meeting, team facilitator Stuart Haggard of VA's Office of Planning and Policy introduced the Community of Practice (COP) concept. The team endorsed this

suggestion to transform itself from a working group to a Community of Practice. Also during this second meeting, a vote was taken to identify the issues of most importance to the team (Appendix E). After identification of the issues, six project teams were formed to address each issue. Project teams included:

- ?? E-Approval Process
- ?? BPR Reports
- ?? Roles of VA, SAAs, Schools
- ?? Information Technology
- ?? Outreach
- ?? Training

Representatives from VA, SAAs and schools were included on most teams.

The E-Approval Process team focused on the creation of a web-based approval file for organizations offering tests for licensure and certification required for certain trades and occupations. Such an approval file was subsequently created exclusively for licensure and certification organizations, the Licensing and Certification Approval System or LACAS. The team also directed its efforts at expanding the web-based approval file to all schools and programs. Such efforts are continuing under the TEES, The Expert Education System effort.

The BPR Reports team was charged with reviewing prior BPR efforts and making any additional recommendations as necessary. Their review included reports of the Transition Commission, General Accounting Office, the education program evaluation conducted under contract with VA by the Klemm Analysis Group, and the prior BPR I and II efforts.

The Roles team sought to review the respective roles of the VA, SAAs, schools and students in the delivery of VA education benefits and to recommend appropriate changes to reflect today's educational environment.

The Information Technology team focused on assessing the various information technology efforts being undertaken primarily by the VA including those that would speed the delivery of benefits to veterans engaged in on-the-job and apprenticeship training.

Outreach team members sought to review current outreach efforts underway by VA, schools and SAAs and assess their effectiveness in providing access to information by veterans and active duty service members.

The Training team members hoped to identify all training efforts conducted by VA, SAAs and schools and to make recommendations to improve and coordinate those training efforts to the extent possible.

It was agreed that each team would work individually to research issues and formulate recommendations for improvement in each area with the goal of issuing a final report in the future.

Following the second meeting of the BPR Community of Practice, another series of monthly conference calls was conducted. A charter for the group was prepared (Appendix C). A third meeting of the Community of Practice was scheduled to report out findings and progress-to-date during the NASAA 2001 annual conference in Orlando, Florida.

The third Community of Practice meeting was held in July 2001 immediately preceding the NASAA annual conference. At the beginning of this meeting, each team reported out their findings and progress in their respective areas of interest. The COP then moved on to identifying specific recommendations upon which a consensus could be reached and which would be included in a final report to be presented to VA leadership. A very preliminary set of recommendations was developed with agreement that further time and effort was needed to finalize all findings and recommendations. The COP tentatively agreed to hold a final meeting in conjunction with the NAVPA conference to be held in Denver Colorado in October 2001.

Following the third meeting monthly conference calls were again initiated in August 2001. The September monthly conference call was cancelled due to the terrorist attacks of September 11<sup>th</sup>. Later, the NAVPA October conference was also cancelled. During the course of monthly calls it was agreed to hold a final meeting after the NASAA midwinter conference in Washington, DC during February 2002. During this meeting a consensus would be sought on final report language and recommendations. Subsequent to the meeting a final report would be issued and presented to VA leadership.

## **History of BPR Efforts**

### **BPR I (Initial Effort)**

#### **Background**

The Veterans Benefits Administration (VBA) began its Educational Assistance Program (EAP) Business Process Reengineering (BPR) project in December 1996, with an assessment of the previous and ongoing improvements within the program. The assessment recommended a structured BPR effort to reexamine its processes, develop additional improvement initiatives where necessary and propose a fully integrated modernization plan.

A Guidance Team chaired by Celia P. Dollarhide, the Director, Education Service, at that time, led EAP's first BPR project. Other members included VBA employees representing the Regional Processing Offices, VA regional Offices, VA Central Office, DoD representatives, and representatives from the National Association of State Approving Agencies (NASAA). The main BPR project team consisted of individuals representing all of these entities as well as one school certifying official, the Director of Admissions and Records, Prince George's Community College in Largo, Maryland. A sub-team was also created to develop a future vision for handling program approval and integrity issues (the work of the sub-team is covered below in item 4).

To redesign the EAP business process, the team incorporated improvement suggestions from stakeholders, reviewed past improvement initiatives from within the program and examined internal best practices as well as external ones. The Team performed a detailed quantitative analysis of the cost and performance impact of its proposed changes. The proposed changes included streamlining rules, revamping the information technology infrastructure and redefining the job positions and responsibilities within the program.

#### **Core Problems**

The BPR team identified eight core problems during its analysis of then current EAP processes.

- ?? Lack of full knowledge of customers' needs and expectations
- ?? Lack of effective partnerships (external and internal)
- ?? Work processes are not driven by customer needs
- ?? Inadequate ADP
- ?? Complex, outdated rules
- ?? Lack of standardization
- ?? Uneven distribution of available resources
- ?? Lack of clear, consistent information sharing with veterans and partners

## **Vision for Improved Benefit and Service Delivery**

The team concluded that veterans and beneficiaries should be able to enroll in an accredited school of their choice. They should be able to enroll electronically, attend class and receive benefits through the Montgomery GI Bill programs, Chapter 32 and Chapter 35 with as few as obstacles and delays as possible. To achieve this vision, the team formulated ten changes to EAP processes.

- ?? Begin outreach efforts shortly after service-member agrees to have pay reduced
- ?? Provide a fully electronic application process to include a completely automated eligibility determination process for routine claims
- ?? Increase employee training and use case management
- ?? Provide external partners with access to data
- ?? Streamline the monthly verification process to burden on students
- ?? Streamline inquiry resolution by providing toll-free access to RPO's
- ?? Update the definition of "Program" to improve education and training opportunities
- ?? Outbase benefits specialist at schools and military out-processing centers to conduct outreach and technical training.
- ?? Enhance and modify the SAA role to meet new process and program needs
- ?? Simplify and updates rules

## **Program Approvals/Integrity and Human Resources Infrastructure**

### **a. Program Approval and Integrity Sub-Team**

The Guidance Team decided to form a sub-team made up of several members from the main BPR project team and additional membership from NASAA and VA regional Office Education Liaison Representatives (ELR). The sub-team determined that the current program approval process was not meeting customers' needs efficiently. The sub-team also made some recommendations on reorganizing EAP's internal human resources, which are covered in section b below.

In the topic of program approvals and Integrity, the sub-team presented the following areas for improvement:

- ?? Expand the definition of program of education to include any training necessary to meet and retain career goals
- ?? Increase VA/SAA presence at major military installations and schools to improve outreach
- ?? Increase the role of SAAs in the compliance survey function
- ?? Allow SAAs to input approval information directly into VA database to improve payment efficiency and to eliminate duplicate clerical effort
- ?? Change several regulations that will result in more consistent program administration

## b. Human Resource Infrastructure

The sub-team also developed an improvement plan for EAP personnel utilization. The plan promoted the team/case management concept. Though not part of the VA human resource infrastructure, the plan included recommendation for the future role of the SAAs.

- ?? Combine the roles of Veteran Claims Examiners and Veterans Benefits Counselor into an Education Benefits Specialist
- ?? Contract routine compliance activity to SAA with monitoring by ELR
- ?? ELR and Compliance Specialist (reclassified as Veterans Education Liaison) to perform more outreach, information dissemination and VACert promotion/assistance at schools.

## **BPR II (Second Effort)**

The former Under Secretary for Benefits, Joseph Thompson, set a goal to have 90% of applications, enrollment certifications, monthly verification of enrollment forms and notices of changes in student status processed to final resolution without human intervention by 2002. In August of 1999, a second VBA Education Business Process Reengineering group issued a detail plan on reorganization and automated claims processing to achieve the Under Secretary' goal (this area was initially addressed by the Program Approval and Integrity Sub-Team during BPR I). This second group was comprised of VBA employees from VA Central Office and the Regional Processing Offices. The report analyzed the challenges to achieving the goal and detailed the structural changes and the reorganization plan needed to overcome them.

## **Challenges**

- ?? Four major current programs with multiple eligibility categories within each
- ?? Significant expansion of automated certification PC program (VACERT) use by educational institutions and fully develop Internet version
- ?? Significant improvements/enhancements to automated enrollment processing program
- ?? Legislative changes and systems changes
- ?? Increased outreach activities

## **Structural Changes**

- ?? Shift from claims processing to case management
- ?? Multi-functional Education Case Manager (ECM) with high degree of technical expertise and public relations skills
- ?? Improve quality, accountability and timeliness of claims
- ?? Position supporting GS-10 grade level

## **Reorganization Plan - Case Manager in Phases**

- ?? Phase I - Staff Education telephone units with maximum number of Education Case Managers and establish out-based Education Service Teams (EST) under the Chief Education Liaison Officers (CELO)
- ?? Phase II - Install additional case management teams when automated processing reaches 40% of submissions
- ?? Phase III - Implement the Case Management Concept to the fullest extent and handle work with a geographic orientation (instead of digits), fully incorporating the team concept with the EST's and case management teams.

## **Current status**

With the exception of maximum use of ECM's in Education telephone units, none of the other goals have been fully accomplished.

## **Summary**

Since the final report on the initial Educational Assistance Program BPR effort was released in December 1997, many of the recommended improvements have been implemented. Some of the recommendations were eventually adopted in whole. However, others were only partially accomplished while a few were dismissed as impractical or not feasible at the time. Additionally, new problems and challenges have arisen since December 1997, and only a few goals of BPR II have been accomplished. Reengineering is never fully completed but is an ongoing process.

The current BPR effort has placed special emphasis on improving service to VA students through developing a strong working relationship among the three stakeholders: VA, schools and the State Approving Agencies. Emphasis has also been placed on reviewing prior BPR efforts to highlight promising recommendations that have been only partially implemented or ignored. This review is especially important for improvements in the IT infrastructure to achieve maximal automation in the areas listed below:

- ?? Fully functional Expert System to automate routine claims processing
- ?? Electronic data interchange (EDI) for improved electronic enrollment certification
- ?? On-line approval file accessible as needed by the three stakeholders
- ?? Automated eligibility determinations for initial routine automated applications
- ?? On-line education benefits inquiry system
- ?? Limited on-line access by school officials to eligibility and payment information

# **Project Team Findings and Recommendations**

## **E-Approval Process**

### **Introduction**

Purpose of Business Process Reengineering E-Approval Project

The purpose of this report is to describe a revised process that would redesign the On-Line Approval File (OLAF). This redesign should provide for a mechanism that allows schools and State Approving Agencies (SAAs) to assist VA in the input and manipulation of approval data and information.

This new process would allow schools, licensure and certification organizations, and job training establishments to:

- ?? Make inquiries of approval records, including the ability to search the database for pertinent information and
- ?? Input new or revised information into the approval database for review by the SAA.

This new process would allow SAAs to:

- ?? Make inquiries of approval records, including the ability to search the database for pertinent information;
- ?? Add new records of schools, licensure and certification organizations, and job training establishments, including the review of information provided by the organization;
- ?? Modify existing records of schools, licensure and certification organizations, and job training establishments;
- ?? Create approval packages and notifications of approval to Education Liaison Representatives (ELRs); and
- ?? Generate the Quarterly Report of SAA Activities, RCS 20-0278.

This new process would allow veterans and other eligible persons to:

Make inquiries of approval records, including the ability to search the database for pertinent information, such as approved schools, job training establishments, licensure and certification organizations and programs of education.

### **Current Procedures**

The system currently in place to update an approval file is extremely labor intensive and fails to provide adequate information to all potential users of the approval file. School officials complete application forms developed by SAAs to meet federal and state laws and regulations. The schools and establishments attach certified copies of catalogs or bulletins and send the applications to the SAA of

jurisdiction. SAAs review the applications received from schools and job training establishments. If the SAA determines that the school or job training establishment can be approved, they make an inspection visit. Upon completion of the visit and resolution of any outstanding issues, the SAA prepares a letter to school and job training establishment containing the information required by section 3678 and the reimbursement contract.

Public Law 106-419 added a provision that allows persons eligible for chapter 30, 32 or 35 benefits to receive benefits for licensing and certification tests effective March 2, 2001. The law contains specific criteria for approvals of organizations and entities offering tests. A system was developed to allow officials of organizations and entities to enter information on their organization on their organizations or entity and the licensing and certification tests they offer. The information is provided to the SAA or ELRs for review and acceptance. While the system does offer the ability for the organization to enter data directly for SAA review, in practice most organizations provide paper data to the SAA, where the review and subsequent entry are performed. The Licensing and Certification Approval System (LACAS) was developed using the Internet as the basis to collect the information and serves as a prototype for the redesign of OLAF. (LACAS web site: <https://www.gibill.va.gov/lac>) VA employees use the Internet web site to search for approved organizations, entities and tests. (LACAS Intranet web site: <http://vbaw.vba.gov/bl/22>) The LACAS system has had a number of enhancements, including the latest, which allows for a public link for veterans and other eligible persons and enhances the system by providing a search function.

Upon receipt of approval packages school approvals are closely reviewed by ELRs. If approval packages are unacceptable, they return the packages to the SAAs with a notice of errors or omissions. If the approvals meet the requirements in law, regulations and contract, ELRs add new records to OLAF or modify existing records based upon the approval notices. They generate VA Form 22-1998 to file in the approval folder for the school or job training establishment as evidence of the action taken. ON a weekly basis, an extract is generated and used to update the Hines facility file.

SAAs notify VA upon determining that schools, job training establishments, and their programs of education have complied with the requirements of the Code of Federal Regulations. SAAs send letters to the schools and job training establishments specifying the conditions for the approval and furnish official copies to VA. The letter contains the following information;

- ?? The date of the letter and the effective date of approval;
- ?? The name and address of the school or job training establishment;
- ?? The authority of the approval and the conditions of approval, referring specifically to the school's approved catalogs or bulletins;
- ?? A copy of the school or job training establishment's application;
- ?? The name of each program of education approved;
- ?? Enrollment limitations such as maximum number of students authorized and student-teacher ratios, if applicable;
- ?? Any other "fair and reasonable" provisions considered necessary by SAAs and the state of jurisdiction; and
- ?? The signature of the responsible SAA official.

SAAAs are required to notify VA of the disapproval of any previously approved schools or job training establishments or programs of education along with the reasons for the disapproval.

SAAAs are required to conduct periodic inspections visits to schools and job training establishments with VA beneficiaries enrolled and pursuing approved programs of education. They are required to complete visit reports and to include copies of the reports with claims for reimbursement under the contract. On a quarterly basis, SAAAs are required to submit statistical reports showing their activities during the preceding quarter. Finally, they are required to submit performance plans with their contracts and evaluations at the end of the fiscal year.

Upon receipt of approval packages, ELRs review them to ensure that the requirements in the law, regulations, and contract have been met. If the approval packages are unacceptable, they return the packages to the SAAAs with notices of the errors or omissions. If the approval packages are acceptable, ELRs enter the information into OLAF. The information is immediately available to all VA employees with access to OLAF. The process of entering information into OLAF is a duplication of the effort already completed by the SAAAs. VA employees are able to access OLAF data to insure the payment of education and training benefits are only to veterans attended approved educational facilities or training establishments. OLAF in and of itself does not enhance the payment of benefits, but is a tool to be used by the adjudicator to facilitate payments. In some cases the school and SAA receive printed copies of the OLAF file. This procedure is inconsistently followed. Occasionally a veteran will have their application denied due to erroneous information in OLAF.

## **Objectives**

There are several objectives that should be accomplished by this project:

- ?? Maintain one facility and program database for VA and SAAAs. This system should incorporate the existing OLAF and LACAS databases;
- ?? Allow school and training establishment officials the ability to input approval and modification requests, including IHL, NCD< Apprenticeship, OJT, Flight, Correspondence and Licensure and Certification organizations;
- ?? Allow SAAAs to add new records and modify existing records of schools and job training establishments in their jurisdiction, to generate forms, reports, notices of approval and inspection visit reports and to transfer revised approval information electronically;
- ?? Allow access by other government agencies and congressional staffs;
- ?? Allow access to the public to view and search for approval information by state, school, program and test;
- ?? System will standardize approval information while providing for additional areas for SAAAs and schools to provide amplifying information;
- ?? System should be able to generate data files to interface with other VA systems;

?? It is expected that this system would need to be web based to allow VA, SAAs schools and the public to have adequate access to the information.

## **Recommendations**

VBA should invest in the development of an on-line approval system that will incorporate all of the components of the current OLAF system, LACAS system, and other our of system approval files. This approval system should be web based and provide for access to schools, veterans and the general public. Specifically, this proposal would:

- ?? Provide schools, job training establishments, licensure and certification organizations, SAAs, veterans and other eligible persons, and the general public with inquiry access to approval records and the ability to search the records;
- ?? Provide schools, job training establishments, and licensure and certification organizations with the ability to enter applications and modification requests and a mechanism for the system to notify SAAs that a request is pending;
- ?? Provide SAAs with the capability to add new records and modify existing records for schools, job training establishments, and licensure and certification organizations in their jurisdiction. Provide SAAS with the capability to return incomplete or unacceptable approvals to the school, job training establishments, and licensure and certification organization;
- ?? Provide ELRs with the capability to review SAAs approvals and revisions and conduct additional reviews and adjustments as required;
- ?? Provide ELRs with the capability to return incomplete or unacceptable approvals to SAAs;
- ?? Provide SAAs with the capability to generate the Quarterly Report of SAA Activities and to transfer the reports to ELRs or the Education Service electronically;
- ?? Promote the standardization of approval information among all SAAs and ELRs;
- ?? Reduce the amount of time required by SAAs and ELRs to maintain current approvals;
- ?? Ensure that completed and accurate information is entered into the records by identifying required fields and developing system edits and consistency checks.

## **Related Projects**

VA is currently involved in a redesign of OLAF that will accomplish most of the intended benefits in this proposal. This redesign is one part of a larger VBA initiative identified as 'The Education Expert System' (TEES). The OLAF redesign is the first part of TEES with a scheduled implementation in FY 2003. TEES is a redesign of the education payment systems into one application using VBA's corporate database. Before payments can be made to veterans and other eligible persons there must be some type of interaction with the approval system to verify that both the establishment and program are approved. The redesign of OLAF and inclusion of LALCAS will help VBA achieve their goal of processing 90% of all education awards without human intervention by FY 2005. A functional requirements document has been published which outlines the specific design requirements of the

approval system rework. A draft of the FRD is included as an attachment to this report. The TEES redesign effort should migrate OLAF to the corporate database and include the other, outside the system, benefit programs including OJT, apprenticeship, flight and licensure and certification.

The Project Team has also identified a need to build an Internet front end that would allow school officials to enter requests for approvals and have them forwarded to the SAA of jurisdiction. SAAs would review the application and if acceptable move it into the approval system and generate an approval notice. The ELR of jurisdiction would have the ability to conduct quality reviews of the approval information and make adjustments as required.

The Project Team has identified a need to make some approval information available to veterans, persons on active duty, reservists, members of the National Guard and other eligible beneficiaries via the Education Services' home page, <http://www.gibill.va.gov>. As a related issue, it appears timely to provide veterans and schools officials with award and payment information. The system should provide current status of payments, as well as past and projected future payments. The design of this interface should look to include as much pertinent information to schools, SAAS and beneficiaries as possible, including such key information as remaining entitlement and delimiting date. It is vital that SAAs be provided this same access as they increase their compliance role in concert with VA.

## **BPR Reports**

### **BPR Recommendations**

**Recommendation: Expand the definition of a program of education to include any continuing education training necessary to meet and retain “Career Goals”.**

This would include continuing education and would allow the annual courses needed to remain a teacher, lawyer, realtor, etc. to be approved for veterans’ benefits purposes.

The current laws and regulations serve the needs of many traditional veteran students, but do not allow the flexibility to enhance career goals of an expanding number of non-traditional students. Veterans have expressed interest in utilizing education benefits to pursue a wider range of education opportunities than those currently allowed.

The recommended change to Title 38 would describe a program of education as: “Is an approved unit course, subject or combination of unit courses and subjects pursued at an educational institution. The approved unit course, subject or combination of approved courses and subjects must be considered as reasonable and sufficient to meet the entrance, continued/higher proficiency or advancement requirements for a specific educational, professional or career goal. It may consist of subjects or courses which fulfill requirements for more than one objective, if all objectives pursued are generally recognized as being related to a career field.”

This change would allow beneficiaries to maintain necessary certifications and licenses for employment in a chosen career field. It would also allow a qualified professional the opportunity for education to get promoted or in developing skills for continued upward mobility. Veterans would be allowed the opportunity to utilize their benefits in a manner that more closely reflects the current workplace.

**Recommendation: Eliminate the need for students to provide mitigating circumstances.**

Current law prohibits payment of VA benefits for a course from which a student withdraws, or for a course that the student receives a grade that will not be used in computing requirements for graduation. There are exceptions if the student can establish that the failure to complete the course was due to mitigating circumstances. The purpose of the original legislation creating these rules (PL 94-502, enacted on October 15, 1976) was to curb abuse of VA educational assistance benefits by certain students who were using the non-punitive grading and liberal withdrawal policies of some schools to receive benefits for several terms without making any academic progress. Congress directed VA to enforce this law in a manner that eliminates Federal payments to students who are not seriously pursuing an education. However, Congress also expressed its intent that VA exercise compassion when considering the domestic difficulties and problems of students making a serious attempt to obtain an education. To address that issue, on June 8, 1989, PL 100-689 was passed stating that students receiving VA benefits were not required to submit mitigating circumstances in “the first instance of withdrawal” from courses totaling not more than six semester hours.

At the time of the original legislation, over 2,822,000 veterans and 66,297 children/spouses were receiving benefits in programs that required no personal monetary contribution. Presently, claimants under the Chapter 32 program contribute up to \$2700 and Chapter 30 participants have their pay reduced by \$100 per month for 12 months. This law, which requires a student to justify withdrawal/termination from school, is over 20 years old, and was enacted when waste, fraud, and abuse were widespread. Student veterans today are much more serious about obtaining an education because they have made a personal contribution to their educational fund. In addition, most schools currently require students to make full payment at registration and limit the period of time in which students can receive a refund if they reduce or withdraw. Therefore, registering and withdrawing from classes would rarely be a profitable endeavor for the student.

Claims examiners spend a great deal of time developing for mitigating circumstances in which many letters move between the student and VA. At least two letters are produced for instances of mitigating circumstance as well as two award actions. Eliminating mitigating circumstances would require only one award action. It would eliminate the need for the 6-hour exclusion letter and tracking of the exclusion. Further, school officials would no longer have to report anything more than a withdrawal/termination date to VA and students would be spared the additional anxiety of responding to letters indicating an overpayment. The Waiver Committees would not have to deal with the overpayments created by this issue. This time and effort takes away from substantive work because approximately 90 percent of all mitigating circumstances received are granted and no debt is created. The team therefore recommends that for terminations the benefits stop effective the date of withdrawal regardless of the reason. In the case of reductions, awards can be reduced on the date of reduction, regardless of the reason as well.

Mitigating circumstances are unnecessary because:

- ?? Standards of progress rules preclude students from attending classes for multiple terms without making any academic progress. These rules, which are required for program approval and enforced during compliance surveys, prevent abuses by students who are not serious about pursuing an education (which was the intent of PL 94-502).
- ?? This is zero-sum game – a student will either lose money or entitlement when he reduces, both of which will cost him in the end.
- ?? Current rules are all or nothing—they force a student to complete a term, even if he is failing, or lose benefits for the entire term; after the rule change, any extra money paid to students who withdraw without mitigating circumstances would likely be partially offset by reducing outlays on students who want to withdraw, but would otherwise complete the term just to avoid a penalty for the whole term.

**Recommendation:** Eliminate the requirement for the school to report to the VA the amount of credit allowed for previous training or experience.

Evaluating and granting appropriate credit is an approval and record-keeping requirement. This issue does not recommend abolishing the requirement for evaluating and awarding credit for prior training if

appropriate, but the manner in which compliance with the laws and regulations is enforced. Title 38, Section 3675(b) requires the institution to maintain a record of previous education and training clearly indicating that appropriate credit has been given and that the Secretary of Veterans Affairs be notified. The primary issue is how to best serve the academic interests of the student while eliminating the need for Adjudication to develop for prior training. When prior credit is not reported on an initial enrollment, the claims examiner is required to develop for the information by sending letters to the facility and in the absence of reporting, defer award action or extend the period of time in which the claimant or school must report if extenuating circumstances are presented. The letter writing and other actions to develop the prior credit information are time consuming and divert the attention of claims examiners away from the goals of accurate and timely payment of benefits. The team recommends that the educational institutions still evaluate for prior training and maintain an adequate record but not report this information to VA. To evaluate schools' full compliance with this requirement VA and the SAAs will review student records during survey and supervisory visits.

The major benefits for VA's performance will be the reduction in processing time, fewer letters to veterans, and fewer inquiries about non-payment. Customers will receive faster service. Although VA will place more reliance on the schools to perform this task without controlling each individual case, there should be more effective contact and outreach between VA/SAAs in the future to address school officials needs, questions and concerns.

**Recommendation:** Revise practical training to include non-accredited courses and clarify approval criteria.

Today's educational marketplace places a greater emphasis on practical experience and training. Most schools have adopted some type of practical training component for a portion of the student's training. Accordingly, SAA's have been required to closely evaluate this training to ensure it meets the requirements for approval outlined in CFR 21.4265(f). Some of these criteria have led to the disapproval of quality programs of education.

The law as currently written bars the approval of many quality programs simply because they are offered at non-accredited institutions. The SAA has the authority to approve programs of study at non-accredited institutions; however, courses with other practical training components are not usually approvable as resident training. In non-accredited institutions, SAAs are already applying additional approval criteria to the programs of education, as well as to institution policies and procedures. There does not seem to be a reasonable justification for excluding courses from approval based only on the school's decision not to seek institutional accreditation at the regional or national level. The SAA is currently tasked with ensuring only bona fide educational programs are approved, and the approval of courses containing other practical training as a component falls within the scope of that tasking. Since an SAA can only approve a complete program, failure of a portion of the program to satisfy the accreditation requirement of 21.4265(f) results in the disapproval of the entire program.

While many courses offered by educational establishments include practical training components, commonly referred to as internship, residency, externship, etc., only a select few are identified in the CFR as not having to meet a specific, detailed checklist of criteria before they can be considered as

residential training. Those not having to meet these criteria include medical, dental, and nursing coursework. It appears reasonable to separate these professional medical courses from other types of courses with practical experience due to the strict licensure and oversight requirements placed on these programs at the State level. Hence, a separate set of regulations has developed that appears to have been designed to ensure the veteran student is getting a quality program for their limited education dollar.

Current regulation is open to interpretation when analyzing the statement "required for graduation". It can be interpreted to mean it is *absolutely* required for the student to take the practical training component before the student can graduate, or it can mean that it simply meets a requirement for graduation. It would seem that the reasonable interpretation would be that it counts toward graduation. Course components, such as internships, and externships, are often offered as an elective. In other words, the student can take an externship, or the student can take a listed residential subject as an alternative. Since the listed externship is only offered as an elective (or choice), this often prevents the veteran student from taking the practical training component, a component that is sometimes more valuable to the student than traditional classroom training.

Current regulations also require that veteran students attend class on at least a weekly basis. It does not appear to be a reasonable requirement, nor does it seem to provide any benefit to the veterans or the training establishment. For example, a veteran student could be conducting the practical training component of the course at a remote location that does not lend itself to regular travel to the main educational site. It is costly and time consuming to require the student to travel to the schoolhouse simply to meet a checklist requirement. The time could be better spent at the practical training site, participating in training activities. There are other means available to the SAA to ensure the quality of the practical training component, such as insuring the school is supervising the activity and evaluating the practical training and program curriculum. While we believe the student and school should interact during the practical training phase of training, the periodicity should be determined by the school and training establishment and left to their discretion to schedule as necessary.

It is recommended that the requirements for approval of other practical training courses as residential training, described in CFR 21.4265 (f)(2), be revised as follows:

<b>Current Regulation</b>	<b>Proposed Change</b>
(i) Accredited by a nationally recognized accrediting agency or is offered by a school that is accredited by <u>one of the regional accrediting association.</u>	(i) Delete this statement.
(ii) A part of the <u>approved curriculum of the school;</u>	(ii) No change.
(iii) Directly supervised by the school;	(iii) Revise the statement to read: "The school and training establishment have entered into a written agreement outlining the activities to be conducted by the student

(iv) Measured in the <u>same unit</u> as other courses;	during the practical training time at the establishment." (iv) No change
(v) Required for graduation;	(v) Revise the statement to read: "Counts toward graduation".
(vi) Has a planned program of activities ...described in the school's official publication which is approved by the State approving agency and which is institutional in nature as distinguished from training on-the-job. The description shall include at least:	(vi) No change.
(A) A unit subject description;	(A) No change
(B) A provision for an assigned instructor;	(B) No change.
(C) A statement that the planned program of activities is controlled by the school, not by the officials of the job establishment;	(C) No change.
(D) A requirement that class attendance on at least a weekly basis be regularly scheduled to provide for interaction between instructor and student;	(D) Revise this statement to read: "A requirement that interaction between student and instructor be scheduled as agreed upon by the school and training establishment."
(E) A statement that appropriate assignments are required for completion of the course;	(E) No change.
(F) A grading system similar to the system for other resident subjects offered by the school; and	(F) No change.
(G) A schedule of time required for the training which demonstrates that the student shall spend at least as much time in preparation and training as is normally required by the school for its other resident courses.	(G) Delete this requirement.

The principal impact of these changes would be the approval of a number of programs of education that contain other practical training components, such as internships, at non-accredited institutions. Additionally, veterans would be able to take practical training components at institutions where the component is offered only as an elective. Furthermore, eliminating the accreditation requirement from CFR 21.4265 (f)(2)(i) renders the criteria for non-accredited courses, outlined in CFR 21.4265 (g), as unnecessary. Accordingly, it is recommended that the approval criteria for non-accredited courses contained in CFR 21.4265 (g) be deleted.

**Recommendation:** Simplify training time measurement decisions.

Currently, the rate of education benefits paid for pursuit of education/training is full-time, three-quarter time, half-time, less than half but greater than quarter-time, and quarter-time or less. The basic governing regulation is 38 CFR 21.4270 but measurement determinations are subject to both legislative and regulatory provisions that dictate long and exacting processes that depend heavily on a detailed

knowledge of difficult and outdated references that take an excessive amount of time to master and put to efficient day-to-day use.

For example, training facilities must submit all term beginning and ending date combinations to their SAA for approval, a task that was relatively simple when all offerings began on the first day of a term and ended on the last day. In today's educational environment, however, accelerated courses, intensive workshop formats and other innovative approaches have expanded the number of start-end date combinations in a given overall term to a three or more page, single-spaced listing that is tedious to develop, time-consuming to approve, and difficult for adjudicators to use when processing an award. For the veteran student, who may have registered and paid for an overall term as a full-time student, confusion abounds as the rate of pay fluctuates among full-time, half-time, and quarter-time or less as the nontraditional-length courses begin, overlap, and end within the term. Total credits earned, or total clock hours completed, should be the determining factor for a pre-approved time period.

The BPR team recommends simplifying course measurement decisions by allowing all accredited and licensed schools (IHL's and NCD's) to certify the student's education rate for an SAA-approved overall term or length of time. Payment according to total credits to be earned in a given quarter or semester (IHL's) or average number of clock hours per week (NCD's) would greatly simplify the certification and adjudication processes and more important, allow the veteran to rely upon a consistent benefit amount for the entire time in question.

## **Roles of VA, SAA, Schools, Students**

### **Charter and Tasks**

This is a report from the Roles Project Team of the Education Community of Practices, which reviews the roles of DVA, SAAs & Schools. This team is one of six project teams formed to address the issues that the Education Community of Practices (BPR-2) identified as the most important issues facing the Educational Benefits program of the Department of Veterans Affairs, State Approving Agencies, Schools and Training Facilities, and veterans and other eligible persons.

The charge of the Roles Project Team was to review the respective roles of the DVA, SAAs, schools, and students in the delivery of the DVA Educational Benefits program and to recommend appropriate changes to reflect today's educational environment. In the execution of that charge, the Roles Project Team reviewed the laws and regulations and reports, discussed the issues and procedures through conferences and through conference calls, and reached the observations and recommendations found in this report.

In the execution of the charge, the Roles Project Team reviewed and assessed the following documents:

- ?? BPR-1 Recommendation (The original BPR report of actions and recommendations)
- ?? BPR-2 Report by the BPR-2 Project Team on Reports (Dillingham's Project Team)
- ?? DVA/CO Vision paper by Dollarhide: "Vision for Reengineering the Education Process" submitted to BPR-2 group (Education Community of Practices) on or about 6.28.00
- ?? Final Report to the Congressional Commission on Service members and Veterans Transition Assistance (Transition Commission Report)
- ?? GAO Report
- ?? Klemm Report
- ?? SAA Report to Congress, 1997
- ?? SAA Report to Congress, 2000

### **Background Information and Notes**

Several items of information and facts became clear during this review. They are identified below and form the basis for the observations and recommendations. In order to understand the recommendations and conclusions presented here, the reader must have an understanding of the background information and basic facts.

It is clear from this review by the Project Team that there is no "absolute" definition of the words "role" or "roles." In the review of the law, regulations, and reports, it is difficult, or nearly impossible, to identify and separate roles from tasks from responsibilities. Roles and tasks and responsibilities and requests for changes are all intertwined and used interchangeably among the laws, regulations, and reports. It becomes clear that any discussion about roles and changes in roles must accept this fact and

work within this condition. Recommendations for changes must clearly define what specific “roles” are to be considered and identify those “roles,” with associated responsibilities.

The roles, tasks, and responsibilities assigned to the DVA, SAAs, schools (and to the students) are established by laws, regulations, procedures, and policies. Any changes in those roles will necessitate the review of appropriate written documentation and necessitate changes to the documentation where appropriate. In addition, the roles, tasks, and responsibilities currently assigned to each group establish a “full plate” for the group; they establish responsibilities that consume currently assigned manpower and resources. Any changes to the roles must be accommodated by changes in manpower and resources.

The roles, tasks, and responsibilities assigned to the various groups form a mutually dependent network among the groups. The roles are intertwined, interdependent, and supportive. A change in one role will affect, not only the group with the responsibility, but also the other groups and their roles. This mutually dependent relationship must be considered in future changes.

One of the most significant facts that must be considered is that the environment in which the Educational Benefits program is administered is changing, rapidly and significantly. The increasing use of computer technology, in the communication, record keeping, administration, and delivery of educational programs, is just one of the rapid and significant changes in that environment. Distance education and the non-traditional delivery methods are two additional environmental changes. This changing environment must be considered in future changes in roles.

It is obvious that changes in roles, tasks, and responsibilities for DVA / SAA / Schools and Students **can be made** to accommodate the needs and the environment. Changes can be effective and efficient. Four facts remain imperative:

- ?? An overall review of changes and the impacts of change will be required
- ?? Laws and regulations and procedures will need to be changed as roles change
- ?? Training and time for incorporating changes will be necessary
- ?? Money and resources will be necessary; offsetting exchanges of man-hours and resources will be required where money and resources cannot be identified.

## **Areas of Responsibility**

From the Project Team’s review, six areas of responsibility have been identified and defined as “roles.” Comments and observations, which suggest modifications or changes or situations for additional consideration, are provided about each responsibility. Comments that are found in other reports are provided in the paragraphs under each responsibility.

Responsibilities and Roles identified in this report:

- ?? PROGRAM APPROVAL
- ?? COMPLIANCE AND SUPERVISION
- ?? TECHNICAL ASSISTANCE
- ?? TRAINING

- ?? OUTREACH AND LIAISON
- ?? LICENSURE AND CERTIFICATION

## **Program Approval**

Program Approval is a responsibility established by law, executed through the DVA Contract, managed through multiple regulations. It is the primary responsibility of the State Approving Agencies and the base element in the Department of Veterans Affairs Educational Benefits, GI Bill program.

Comments from the review of reports suggest: **modification of the Program Approval role.**

- ?? SAA Report to Congress, 1997: SAAs primary responsibility, by law, to evaluate and approve programs of education; includes on-site visits for supervision; approval process is different and distinct from accreditation processes
- ?? SAA Report to Congress, 2000: SAA mission is to promote and safeguard quality educational and training programs; appraisal of program standards is elementary and required by law; different than the accreditation process; additional missions include ongoing contact and supervision, technical training and assistance, and outreach
- ?? GAO Report: Recommends program approval should include unaccredited programs and OJT/FLT/LAC/ COR programs; minimize or avoid approval of accredited programs
- ?? Klemm Report: Recommends program approval should accept DOE standards; SAAs should approve all others
- ?? Final Report of the Congressional Commission on Service members and Veterans Transition Assistance: This report recommends that program approval concentrate on new courses, providers that require special oversight, new providers of technical training; program approvals should focus where there are complaints, where there are “reasons;” more focus on OJT/APP and Distance Education

**Recommendation:** Any modifications to the Program Approval should retain the responsibility for SAA approval of accredited and non-accredited programs; should recognize the inherent qualities added by the accreditation process; should recognize accreditation and approval are different processes. It is not in the best interest of the veterans, other eligible persons, DVA, or the states to remove the responsibility for Program Approval or to move that responsibility from the SAA. If the role of Program Approval is modified, training and financial support will be required. If Program Approval is changed, the law and the contract must accommodate the changes.

## **Compliance and Supervision**

Compliance and Supervision are responsibilities established by law and executed under multiple manuals and regulations (AACRAO, DVA Manual 22-4, SAA Contract). Compliance and Supervision are shared responsibility between DVA and SAA.

Comments from the review suggest: **combine Compliance and Supervision and move the Compliance function, or part of the function, under SAA responsibility.**

- ?? DVA/CO Vision: There will be a need for more compliance and supervision as the electronic systems do more of the claims processing; schools will need more training and assistance
- ?? Guidance from Thompson & Principi: Combine the Compliance and Supervisory Visits; move the responsibility for compliance into the SAA as the number of ELRs and other education personnel in DVA decline
- ?? DVA Contract: Allow SAA to accomplish Supervisory Visits as needed, not annually

**Recommendation:** Where possible, allow a combination of DVA and SAA responsibility for Compliance Surveys. SAAs can augment DVA Regional Processing Offices with Compliance Surveys where manpower, experience, and capability exist. When Compliance Survey responsibility is added to SAA responsibility, cost and resources accommodations must be considered.

## Outreach and Liaison

These two responsibilities have been enhanced by recent legislative review and changes in the law; are now part of the DVA contract. DVA/CO guidance has supported increases in these responsibilities. These responsibilities are not specifically, precisely defined and management remains within the agencies' definitions and abilities to perform.

Comments from the review suggest: **enhance and increase the responsibilities for Outreach and Liaison; move more responsibility into SAAs.**

- ?? DVA/CO Vision: Expand outreach to active duty and to returning veterans; work within each State to reduce licensure and certification transition issues for returning veterans; work to ensure veterans are granted credit for previous military training
- ?? Klemm Report: Promote OJT training
- ?? Transition Commission Report: Only 48.7 percent of MGIB recipients use their benefits; increase emphasis on OJT/APP and use of MGIB
- ?? BPR-1 Report: Advocates new legislative to enhance MGIB use; DVA/SAA should enhance on-bases information programs and TAP presentations

**Recommendation:** Outreach and Liaison are greatly needed in the Educational Benefits program to promote the use of the MGIB. Since SAAs are located within each state, they have an understanding for what is needed in each state and can respond locally. Support for increased Outreach and Liaison will need contract changes and funding.

## Technical Assistance

Technical Assistance is a term used to define assistance “in any interaction designed to assist an individual, a school, or training site personnel with any portion of the approval function;” assistance and

training necessary for the execution of the Program Approval or the administration of the MGIB. Technical Assistance is defined in the Quarterly Report of the SAA Activities and in various manuals and regulations.

Comments from the review suggest: **more Technical Assistance will be required with the reduction of DVA educational personnel and with the shift of emphasis into electronic procedures; more Technical Assistance can be performed by SAAs.**

?? DVA/CO Vision/DVA Guidance: Enhance the use of electronic technology and the use of VACERT; support efforts to move schools into the electronic age

**Recommendation:** Technical Assistance is an absolutely necessary responsibility of the approval process. The execution of the responsibility is charged to the SAAs. Technical Assistance must be continued and additional efforts will be required along with additional efforts in Training.

## Training

The Project Team identified “Training” as a role that requires special and additional consideration. The team determined that there is a distinct difference between Training and Technical Assistance. Technical Assistance deals primarily with the approval process and the execution of that approval. Training is defined as additional support (training, teaching, mentoring, and assistance) offered by the SAA and DVA to the individual schools and training organizations and to the staff and support personnel of the schools and training organizations. Training efforts deal with the record keeping procedures, administration requirements, reporting procedures, and all work associated with making the Educational Benefits program function.

Comments from the review suggest: **the need for training will increase significantly over the next few years as DVA educational personnel, who provide the training, decrease or are removed from the system.**

?? DVA/CO Vision: There will be a need for more compliance and supervision as the electronic systems do more of the claims processing; schools will need more training and assistance

**Recommendation:** The need for training, and the increase in the need for training, should be recognized. Training is a responsibility shared among DVA, SAA, and the schools. With the reduction of DVA personnel new methods of providing training must be found. SAAs can assist within the states but will need time, cost reimbursement, and modification from the contract. Electronic methods can also assist.

## Licensure and Certification

This is a new role mandated by legislation and implemented in March 2001. The rules and regulations are currently being managed within DVA, as mandated by law. The approval processes, within the

states and within the federal government, have been defined. The management of the process within the State Approving Agencies and the DVA is evolving. The FY 2002 Contract provides guidance and management requirements for the program; provides a funding option for SAAs.

Since this is a new responsibility, the full ramification and involvement of the DVA and SAAs has not been realized. This is a work in progress. However, the indications are that this new role **will increase and expand; could become a significant change in the responsibilities of both agencies.**

**Recommendation:** It is imperative that the agencies involved in the Licensure and Certification (DVA and SAAs) work together to execute the program; to ensure veterans and other eligible persons are served; that costs and time requirements for the new program are managed and accommodated.

## **Summary and Conclusions**

The conclusions reached by the Project Team are very positive. In this time for change, the Project Team finds that changes to the roles, tasks, and responsibilities for DVA, SAAs, schools, and students can be made, can be positively and effectively incorporated. However, any changes should be considered and measured and made with the following understandings:

- ?? Change and changes must be managed, not done arbitrarily
- ?? Laws and regulations must be changed to accommodate modification in roles
- ?? Time and training must accompany changes
- ?? Money and resources must support changes; costs or cost exchanges must be considered for each change.

## Information Technology

The Information Technology team is focusing on assessing the various information technology efforts being undertaken primarily by the VA including those that would speed the delivery of benefits to veterans engaged in on-the-job and apprenticeship training.

The team, after several conference calls, face-to-face meetings and email communications, has identified four areas of information technology to address. These areas are:

- ?? IT Administration
- ?? The Education Expert System (TEES)
- ?? Web Site/Web Portal
- ?? Electronic Transfer of Information
- ?? Electronic Signatures (E-SIGN) and Public Key Infrastructure (PKI)

The team consisted of Les Bakke, Michele Bowies, Bob Craig, Ralph DeBar, Hampton Fox, Faith Stellitano and Danny Stewart.

## IT Administration

**Recommendation:** It is recommended a Chief Information Technology Officer in the Education Service and at each RPO (Regional Processing Office) is needed to coordinate education technology initiatives.

The team members have determined the need for a Chief Information Technology Officer “CITO” in Education Service and at each RPO to coordinate ES information technology initiatives. The CITO would be responsible for developing and putting into action a coherent plan for all information technology projects. They would make sure that all information technology projects are coordinated among the RPOs and are consistent with Education Service information technology goals. The CITO in ES would coordinate all projects with the various divisions within VBA and would be an advocate for Education Service’s projects and goals.

In the past Education Service and the RPOs have initiated a number of information technology projects. These projects lacked cohesion and a single point of contact. This results in duplication of effort and wasted time in completion of various projects.

The CITO would be responsible for coordinating with other divisions within the VA to expedite the completion of projects needed to meet the goals of ES. There seems to be a need for more communications and cooperation with security requirements set by (20S, General Council, etc.).

## TEES

**Recommendation:** It is recommended a comprehensive review of TEES needs to be conducted to ensure it address all issues that field VA staff, SAAs and school believe needs to be considered.

The Education Expert System (TEES) is in the process of being developed. The team has determined a comprehensive review of TEES needs to be conducted to ensure it addresses all the issues we, from our various perspectives, believe needs to be considered. TEES requires strong administration (see IT Administration). TEES is the future of benefit payment and processing within VBA. Therefore, it requires detailed development and implementation through out the project. The need for information sharing and project coordination is imperative for the development of software programs which result in effective veteran's education benefits award processing.

## Web Site/Web Portal

**Recommendation:** It is recommend a web portal expanding upon the [www.gibill.va.gov](http://www.gibill.va.gov) web site and providing "one-stop shopping" to veterans, schools and SAAs should be developed.

The team members feel the establishment of a web portal would benefit the VA as well as our customers. The web portal can be built into the existing [www.gibill.va.gov](http://www.gibill.va.gov) ESU website. The website must be designed current VBA standards taken into consideration. The website must be developed to allow access to information by VA customers (veterans, school officials, etc.). WAVES is a good first step in developing the web portal.

Many departments, such as the Department of Education and Student Financial Aid have updated their web pages. Their new pages are web portals and give you "one stop shopping" capability. This is the direction the VA should follow. The advantage to web sites is that students can access one web page and be linked to several different sources of information. For example, the web portal should have a link to web sites for schools that are VA approved. Students would be able to find out information at this web site pertaining to their VA benefits, remaining eligibility, status of claims, obtain applications and other documents, etc. This would greatly eliminate the number of calls placed by students to schools and VA.

Several colleges have web sites that provide the option to register on-line. Since financial aid is an important consideration for students when registering, schools have added a link to their financial aid information. It gives them the status of their application, how much they have been awarded and when they can expect disbursement of funds. By answering these basic questions on-line, it gives staff time to deal with students with difficult problems. This is the kind of information should be available by entering a user id and password (PIN) at the student web portal login page. Many of the web portals have separate access for students and different log in pages for schools. The web portal should be the main contact for schools and students.

## Electronic Communications

**Recommendation:** It is recommended that VACert needs to be transported to an Internet based application and its use should be mandatory if an IHL or NCD facility with 10 or more VA students wishes to participate in the training of veterans and their dependents.

VACert is an application already in existent and overall functions very well. The team feels VACert needs to be transported to an Internet based application. By transporting VACert to the Internet there would be only one application to maintain. This would alleviate the need for several versions VACert based on the various versions of Microsoft Windows. It would allow schools operating on the Macintosh Operating System to participate in the VACert program. Different people have different views as to whether VACert should be a PC or Net based application. As long as it is PC based there will be a need for several versions of the program and require a modem for communication with the main system. However, we need to commit to one platform the Internet and one direction utilizing current IT hardware within the VA. The team feels it would be reasonable for VA to “mandate” use of VACert if an IHL or NCD facility with 10 or more VA students wishes to participate in the training of veterans and their dependents. This would be similar to the U.S. Department of Education mandating facilities to electronic transmit financial information to them by facilities wishing to be approved for the Department of Education Financial Aid programs.

## Electronic Signature (E-SIGN) and Public Key Infrastructure (PKI)

**Recommendation:** It is recommended that Electronic Signature (E-SIGN) and/or Public Key Infrastructure (PKI) be used to provide system security for access of information by our customers.

This would result in the VA using a security system allowing two-way communications between VA and our customers. The security system could be done with the use of Electronic Signature (E-SIGN) or PIN (Personal Identification Numbers) numbers.

As of July 1, 2001, students applying for loan from the U.S. Department of Education have been able to use personal-identifications Numbers distributed by the U.S. Department of Education, or other types of electronic signatures provided by their lenders, to identify themselves when applying for student aid, signing for their loans, or monitoring their loan accounts on the Internet. College-aid administrators say using electronic signatures will significantly speed up the delivery of loans to students. Congress passed a bill, giving electronic signatures the same legal status as written signatures, went into effect July 1, 2001. As a result, students using the U.S. Department of Education’s electronic aid-application form, FAFSA on the Web, will not have to mail to the department separate signature pages to prove their identities.

Public Key Infrastructure (PKI) is an important capability to support applications that deliver electronic services across open networks such as the Internet. These services will benefit both veterans and VA employees. PKI creates a more secure and trusted environment for doing business across the Internet,

especially business involving sensitive or private information. Most agencies presently use combinations of user names and passwords to identify individuals desiring access to their network. The password model for security is weaker on the Internet because it is vulnerable to eavesdropping and simple guessing attacks.

PKI is based on a security model called “public key cryptography”. Using the features of certificates, digital signatures, and encryption, PKI provides four strong security services. These services are called authentication (proof of identity of the individual), confidentiality (proof of the audience to the electronic transaction), integrity (proof of the content of the transaction), and non-repudiation (proof the action was requested by that individual). PKI provides the foundation to manage “key pairs” and their associated certificates.

General Counsel provide its opinion in Precedent Opinion 65-91 issued in 1991. In its conclusion, General Counsel urges that if VA should accept electronically transmitted data, it devise and make enforceable an agreement between the agency and the sender of the information that absolves the former of any consequences arising from the use of this medium (for example, a malfunctioning fax machine). Finally, the opinion states that the parameters of the VA’s discretion to accept electronic evidence is restricted only by how favorably the Secretary views the extent of the original document’s availability for verification. A risk management analysis is the appropriate vehicle for determining whether documentation will be accepted in such circumstances.

Electronic Document Processing System Technology, VAOPGCADV 17-91 provides an examination of the many legal issues raised by a transformation to a “paperless” environment. Although only an advisory opinion, it extensively discusses the general legal requirements that General Counsel identifies as being applicable to any use of electronic document processing system technology (EDPST).

Any information gathered or maintained via EDPST is an agency record as defined by statute (44 USC Sec. 3301) and must therefore adhere to the statutory and regulatory requirements governing such records’ creation, use and removal. More specifically, any electronic records created due to use of EDPST must also comply with the electronic management regulations promulgated by the National Archives and Records Administration and the General Services Administration under the authority of 44 USC Chapters 29, 31, 33, and 35. Any failure on the part of VA to conform to prescribed security and maintenance procedure exposes the agency to adverse court action under the Administrative Procedure Act, whereby a claimant claiming harm from non-compliant record-keeping may challenge either the records’ admissibility or ask for a set-aside of any agency determination based on such records. Similarly, as EDPST can be classified as automated data processing equipment (ADPE), any deviation from the prescribed operational and procurement standards may trigger a loss of authority or an invalidation of an existing procurement. Due to its status as a federal computer system, any electronic technology used must follow the relevant Federal Information Processing Standards (FIPS) issued by the Department of the Commerce; failure to comply could result in a successful challenge to procurement.

The Computer Security Act mandates that any ADPE system must have a security mechanism proportionate to the risk incurred if the system is misused or data is tampered with by third parties, and safeguards must comply with applicable FIPS and OMB guidelines. The Privacy Act applies if data is sorted by individual's identifying information (such as social security number). Depending on the nature of the information being maintained, any EDPST would need to restrict access only to those VA employees requiring access in order to complete their assigned task. The Paperwork Reduction Act would require compliance with its provisions if the EDPST would collect data from non-Federal persons and entities.

When addressing the question of acceptance of electronic records in the federal court system, the opinion notes, "It would appear that electronic records generally would be admissible in court proceedings provided the requirements of these various statutes, court rules and regulations are met". However, General Counsel qualifies that statement by stating that there exists a degree of uncertainty regarding COVA's position on this issue.

Although the opinion approves of a transition to a electronic processing environment, it advises that in order to do so the new technology must be in compliance with all applicable legal requirements: certifying that the information being processed is accurate and individuals' identities have been verified, protecting against misuse or alteration of the data, and safeguarding the system from structural interference such as storms/power failure. General Counsel concludes by cautioning that VBA should take the following steps prior to implementation: determine whether COVA would accept electronic records into evidence, if governing statutes or regulations appear to require a paper document then seek applicable legislative/regulatory amendment, preserve paper copies if any state statutes require it, and retain the original document in cases where a challenge to its authentication has been at issue.

The issues raised by VAOPGCPREC 65-91 and VAOPGCADV 17-91 are not incompatible with the provisions of OMB guidelines; both advise agencies to do the following before full deployment of an electronic or PKI environment: amend relevant policies/regulations as necessary in order to promote electronic information transmittal, maintain the appropriate information system security safeguards, and perform a risk analysis for each potential application in order to determine if an electronic medium of transmission is appropriate. For documents that have historically been subject to judicial authentication challenges as to signature validity, such as a beneficiary designation form, I would recommend soliciting guidance before any electronic implementation from VA General Counsel and the Legal and Policy Working Group of the Federal Public Key Infrastructure Steering Committee.

## Report on Education Outreach

Finding: The “Report on Education Outreach” of June 27, 2000 outlines in detail planned initiatives to enhance the VA’s outreach effort. Our committee felt that within given constraints of personnel, time, and money, that this plan was more than adequate in fulfilling the VA’s outreach role.

Germane to any discussion of outreach is recognition that there will be a large portion of the veteran population who will not use their benefits due to family and personal considerations at the time of separation, despite the most aggressive outreach effort. The plan proposed in the cited report is probably the best possible approach, provided it is implemented.

**Recommendation:** That the VA aggressively and completely implement the initiatives described in the “Report on Education Outreach” dated June 27, 2000.

## Approved Programs Database

Finding: Making veterans aware of their educational benefits is only the initial step in getting them to use the benefits. Equally important is showing where those benefits can be used. During the BPR’s January 2001 meeting in Washington, DC, Sharon Lesh of the State Approving Agency in Oregon demonstrated a database for the Oregon schools that allowed a veteran to search on-line for approved programs. To the extent that this information is available in other states, it should be advertised to the veterans. Furthermore, those states that don’t possess such a tool should be encouraged to develop one, possible with the assistance of VA money and/or expertise.

**Recommendation:** That the VA advertise in letters and pamphlets, and provide a link via its website, to databases listing those programs approved for the use of VA educational benefits.

## Roster of Names and Addresses (RONA)

Finding: The RONA is a list all recently discharged veterans, and is provided in computer tape cartridge format by the DVA Automation Center in Austin, TX. It is a useful tool for colleges looking to recruit veterans as students. Over the last 20 years approximately 160 institutions of higher education have requested the RONA, once, occasionally, or on a recurring basis. Presently there are only 2 colleges/universities purchasing the RONA on a recurring basis. The purchase fee varies based on the parameters of the data processed, and the DVA Records Management Service could not provide an accurate estimate of the average fee per annum.<sup>?</sup> By way of example, Penn State University pays \$672 annually to receive a monthly list of all recently discharged veterans in the state of Pennsylvania. Logistical considerations in the use of the RONA include the school’s ability to accept data from a cartridge tape, and a demonstration that the request reasonably fits the

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<sup>?</sup> Data on school usage and processing fees was provided by Dolly Jackson of the DVA Records Management Service at (202) 273-8019.

school's recruiting profile (for example names from all 50 states would not be provided even though the student body may reflect all 50 states). Names are sorted by zip code. Furthermore, per Section 5701 (f) of Title 38 USC, the RONA may only be provided to "*any nonprofit organization if the release is directly connected with the conduct of programs and the utilization of benefits under this title.*"

**Recommendation:** That the VA Education Service offer the RONA free-of-charge to all SAAs and applicable schools requesting it, for use as a tool to recruit students for VA approved educational programs.

## **Communication between Department of Veterans Affairs, Department of Defense, Department of Labor and Department of Education**

**Finding:** Previous reports and studies have pointed out that significant numbers of veterans are still separating from the services without knowledge of their educational benefits. Capturing this population after leaving active duty is often impossible due to changing addresses and the uncertain future plans of many veterans. Therefore, contact prior to separation is crucial, and this can only be done with the assistance of the DOD. Although at present the VA participates in TAP briefings and contact with active duty service members, the approach is inconsistent and varies by state and base. This deficiency was noted during the aforementioned Report on Outreach Education. A uniform presentation, with possible assistance from the schools, might enhance the TAP briefing effort. But, DOD would have to play a part in getting the bases to agree and provide time and support during the briefings. DOE need communicating with for obvious reasons, but DOL is needed because they do TAP briefings and a uniform agenda will be beneficial to the veterans regarding communicating the GI Bill entitlements.

**Recommendation:** That the highest level of the VA work with DOD, DOE and DOL counterparts to establish a formal and regular line of communication and oversight to provide the cooperation necessary to adequately inform active duty service members and veterans of their VA educational benefits before and after separation from the service.

## **VEOP**

**Finding:** The Veterans Education Outreach Program (VEOP) was a federally funded grant opportunity for colleges and universities that financed programs to reach out to veterans in the local communities and assist them in pursuing a college degree as a viable career option. VEOP provided the opportunity to develop a myriad of programs designed to meet the individual needs of that college or university and the veteran. The scope of this program was limited by the imagination of the veterans certifying official. Today, the Department of Veterans Affairs is struggling with reaching active duty personnel to advise them of the many opportunities to use their Montgomery GI Bill (MGIB) to pursue a college degree. Many service members do not attend the transition

briefings at their last posting or assignment. Anecdotal information received from Veteran Program Coordinators and/or VA certifying officials indicate that many of the veterans with whom they come in contact are unaware of access procedures to activate their MGIB. Many simply cannot afford to attend college and maintain a family as reported by in studies by Chris Goodrich of Portland State University and Ron Atwell of the University of Central Florida; however, through VEOP schools were able to assist many veterans who otherwise could not afford college through targeted outreach and scholarship programs. In 1992 Congress passed the last Veterans Education Outreach Program grant authorization. In 1993, HR 996 was introduced in the 103d Congress but was never sent to committee and therefore failed. This bill would have renewed VEOP and moved the administration of the program from the Department of Education to the Department of Veterans Affairs, a more appropriate guardian. However, Congressional interest in the program and garnering support of the administration was unsuccessful. Since the demise of VEOP we have seen a decline in veteran student enrollment and college completion rates of veterans using the GI Bill. VEOP gave the program administrator the tools to be creative and to assist veteran students become successful.

**Recommendation:** That the Secretary aggressively pursues legislation to reinstate VEOP. The funding would subsidize efforts by schools to actively seek out veterans in the community who have entitlement to the MGIB who, for whatever reason(s), may not be aggressively pursuing a college degree/career enhancing opportunity. Restoring VEOP would assist the Department of Veterans Affairs in making the MGIB a viable option for many thereby assisting the veteran in becoming a better educated and informed citizen while increasing the success of the MGIB as a recruiting, retention and readjustment program.

## **SAA Outreach Activities**

Finding: The State Approving Agencies outreach activities are diverse. SAAs have made efforts to undertake the monumental task (without additional funding) to reach out to various groups and promote the increased usage of veterans' educational benefits. At the request of the VA, State Approving Agencies are heavily engaged in outreach efforts to promote the usage of veterans' educational benefits. Some SAAs have developed radio spots, television videos and print advertising to encourage veterans to take advantage of the GI Bill and especially apprenticeship and on-the-job training programs. SAAs do "welcome home" mailing to newly separated veterans congratulating them on their service and informing them of their benefits and the educational/training opportunities available to them in their State. Many SAAs make presentations at military retirement seminars and the transition assistance programs (TAPS) for those leaving the service. SAAs participate in local military and veterans events; job fairs, stand-downs, and other venues where they can encourage the use of benefits. They work with the Department of Labor to assist veterans to find appropriate employment and training - In some states, the National Guard looks to the SAA approval in identifying programs eligible for national guard members to receive tuition support

SAAAs have expanded their outreach efforts to promote increased usage of GI Bill benefits. Last year, SAAAs conducted 7,800 outreach activities. They continue to actively search for new ways to increase usage of the GI Bill and counsel veterans on available benefits and educational programs within their state. SAAAs are directly involved with the new and emerging trends in education and training - ensuring their quality and availability for veterans

**Recommendation:**

- ?? **As a result of Public Law 107-103 - Improved Outreach Services for Separating Service members and Veterans:** Requires that State Approving Agencies (SAAs), in addition to VA, actively promote the development of VA programs of training on the job (including programs of apprenticeship). Also requires SAAs, in conjunction with outreach services furnished by VA for education and training benefits under chapter 77 of title 38 USC, to conduct outreach programs and provide outreach services to eligible persons and veterans about education and training benefits available under applicable Federal and State law. This public law supports the outreach system that is currently needed.

## **Training Activities**

The purpose of this committee is to facilitate training for Veteran Program Administrators (VPA) and/or Certifying Officials to properly administer all veterans education programs. To identify and evaluate the effectiveness of training programs currently available to Veteran Program Administrators/Certifying Officials (VPAs/ COs).

## **Training Standards**

**Finding:** Multiple training materials exist with conflicting direction among and between states, RPOs and VPA associations. Inconsistent application of current rules governing veterans education programs. Each state/RPO provides a somewhat different interpretation of the regulatory requirements.

**Recommendation:** Develop training manual(s), activities, and communication vehicles to assist all VPAs stay abreast of processing requirements, technology and regulatory changes. National, regional and state organizations/associations stand ready to provide the vehicle for delivery of training programs. This committee recommends the development of training standards to administer a "National Program". Develop course syllabus etc. to be used by all VPA associations for training. NAVPA (in cooperation with the DVA and NASAA) conducts an annual, 6 hours Basic training Workshop to train new certifying officials. Recommendation is to have this material ready for the next Basic training workshop to be held in Denver CO on October 2003. This program should be expanded to include OJT and Apprenticeship training.

## **Training Opportunities/VEOP**

**Finding:** Educational Institutions' budget constraints limit resources available for the administration of Veterans Education Programs. Certifying Officials at many institutions wear several hats (other duties) and VA is not always their primary responsibility. Due to downsizing of the government the USDVA is not staffed to provide one on one training which keeps pace with school certifying official turnover. Training is not affordable for smaller schools or seen as unnecessary for schools with only a few veterans each year. Training opportunities are currently available in all four regions, reaching about 45 states on an annual basis.

**Recommendation:** Request funding to reinstate the Veterans Education Out Reach Program (VEOP) to assist and encourage educational institutions to participate in electronic certification and transmission, outreach and enhanced training. Please refer to the Outreach Report for rationale and details concerning VEOP.

Request financial support to implement recommended training opportunities and material. Increase opportunities for VPAs/COs to participate in training activities endorsed by the DVA. Coordinate

training needs and meeting schedules with VPAs. Take advantage of opportunities for VA and SAA to bring workshops to the schools.

In addition to the National Institute of Veterans Education (web site) training for certifying officials, the SAAs and ELRs should provide mini workshop while traveling to conduct compliance surveys and supervisory visits using the Florida State Approving Agency for Veterans Training mini school workshops as a model ( best practice).

The National Association of Veteran Program Administrators (NAVPA) has agreed to work with the Department of Veterans Affairs and other appropriate agencies to revise, print and distribute the manual “Certification of Students under Veteran’s Laws”. And to develop a committee to revise the Certification of Students Under Veteran’s Laws Manual to include statutory and regulatory references.

## **Electronic Certification**

**Finding:** Electronic certification is not required or available for processing all chapters; therefore training must include two modules (i.e. Electronic and Manual).

**Recommendation:** Develop an electronic, web based certification system that processes all chapters and programs and implement a plan to require the use of this system within 3 years for all VA educational programs and require all institutions with 10 or more students to use the electronic certification system to submit all required reports to the VA..

## **Communication/Public Awareness**

**Finding:** There are varying levels of commitment to veterans programs by educational institutions, primarily due to limited and/or lack of communication among and between the states, the DVA and the schools. Educational institutions are not universally supportive of a veterans affairs office or certifying official and some have placed this function within the financial aid office, or as a part time function within other administrative areas on campus.

**Recommendation:** That the DVA develop a public awareness training package for college and university leadership. It is suggested that this training package be promoted through the professional associations of collegiate such as the National Association of Student Affairs Officers, and other national associations of which presidents, vice presidents, chancellors and provosts and vice provosts align themselves with for professional development.

Mandate or strongly suggest that the reporting fee be used for administrative support such as technology, training and employee development on an annual basis because of the many changes imposed by changes in public law each year. In addition, this committee recommends that the reporting

fee paid to educational institutions be increased to \$50.00 per student rather than the current \$7.00 and \$11.00 which has not increased since the inception of this program.

### **DVA Policy and Procedures - Redefining Their Purpose**

**Finding:** Multiple processing applications and rules for the various education programs. Administrative procedures in place may not be relevant in light of the changes made in the educational curriculum and delivery method of today. Many of the procedural guidelines and policy was developed as much as 20 to 30 years ago and are no longer relevant.

**Recommendation:** DVA should review policy and procedures associated with processing educational, OJT and apprenticeship claims with a view toward eliminating and/or redefining their purpose. Where technology or a new program is introduced, the old procedure/process/policy should be eliminated. New policy and/or procedures should be developed for new programs so that certifying officials would have a clear understanding of process and not have to untangle old practices.

## Appendices

### A Vision for Reengineering the Education Program

Education business process reengineering encompasses three entities—VA, schools and State approving agencies. Although we are separate and distinct entities with different missions, we share one common goal: to deliver VA education benefits to those who have earned them, and to their dependents, in a timely, accurate and compassionate manner.

To accomplish that goal, we must strive to be customer-driven organizations operating in an environment of rapid technological change. From the viewpoint of the veteran-student customer, we should attempt to provide seamless service from approval of programs, to delivery of educational services, to receipt of benefits earned.

In order to provide seamless service in a rapidly evolving technological environment, we must constantly change, or reengineer, our respective business processes.

For the VA, reengineering our business processes means moving our claims processing to TEES. TIMS or The Image Management System, stores claims and documents electronically, but human beings still process those documents manually. The vision for TEES, The Expert Education System, as expressed by the Under Secretary for Benefits, is that 90 percent of education claims will be processed without human intervention by the end of fiscal year 2002.

Reengineering in VA also means moving our existing paper-based business processes to electronic transactions over the Internet. WAVE, the Web Automated Verification of Enrollment, is now available to veterans on our [gibill.va.gov](http://gibill.va.gov) web site. Montgomery GI Bill veterans may now verify their monthly enrollment with VA over the Internet. VANetCert will give schools the ability to certify veterans' enrollment data to VA over the Internet. It will also show the individual veteran's award data so that school officials will be able to answer routine benefit inquiries. With VONAPP, the Veterans' On-line Application, veterans will be able to apply for education benefits on the Internet, "sign" the application using a digital certificate and submit their application to VA electronically.

Schools are the second element in reengineering the delivery of VA education benefits. School certifying officials will become an even more critical link than they are today in the delivery of accurate and timely education benefits to veterans. They will directly provide raw enrollment data to TEES, which will automatically process the data and initiate delivery of benefits. We, the VA and SAAs, must invest more heavily in our training efforts and assistance visits with school certifying officials. Recognizing the high turnover rates among certifying officials, we need to explore new ways of insuring that they are adequately trained, whether it be by Web-based training lessons, mentoring by other schools, VA or SAA personnel video conferencing, or through other means.

As part of our overall reengineering process, we have entered into discussions with the National Student Data Clearinghouse regarding the provision of automated student enrollment data directly to the VA. The Clearinghouse has already negotiated a contract with the Department of Education to provide student enrollment data for recipients of direct loans and grants. We are also going to pilot test the use of digital certificates with school certifying officials so that in the future automated environment we can have some degree of certainty that the person providing enrollment data from the school is indeed the certifying official.

The third party of the triad providing education benefits to veterans is the State approving agency. In the Internet age, it is imperative that we move our business processes from paper-based to web-based to the extent possible. We would like to see a fully automated approval process from the school to the SAA to the VA. The business processes at many schools are already on the Internet from school catalogs, to student application and registration to the issuance of grades, not to mention the delivery of educational content. Our school partners are equipped to provide information to us electronically, yet today, in most cases, they can't because we are not equipped to receive and process that information electronically.

Automating the approval process should result in more time for us in the VA and SAAs to focus our efforts in areas such as oversight of schools which we believe will become much more critical as we in VA move into an automated processing environment. To maintain the integrity of the VA education program, we need to look at compliance survey schedule requirements and make sure that they are focused on high-risk schools, whether they are large or small, 2- or 4-year, public or private. We also need to review the SAA supervisory visit schedule with the same goal in mind. We need to insure that our oversight efforts complement one another and not result in duplicate effort. In two States we have piloted tested SAAs in conducting compliance surveys. Those tests have worked well and we should expand those efforts to the degree that it is mutually beneficial to both parties.

Automating the approval process should also allow us to redirect our resources to other areas as well. We should continue and where possible expand outreach to active duty military personnel through the Transition Assistance Program and outreach to veterans after they return home from active military duty.

The Congress is moving towards a seamless transition from military to civilian status in several areas. First, they have passed legislation providing for the approval of and payment of Montgomery GI Bill benefits for test preparation courses. They have asked VA for a report of State provided veterans' education benefits in order to obtain a comprehensive view of all education benefits provided to veterans. We in the Education Service are serving on an interagency task force to examine how active duty military and veterans may obtain State licensure or certification for their occupation without having to replicate previous military training. We want to encourage State approving agencies to explore what service they can provide to support this seamless transition to a total benefits portfolio at the State level.

A trend in both State and federal governments over the past several years has been the examination of program outcomes. In the VA the Government Performance and Results Act (GPRA) requires us to evaluate the outcomes of each veterans benefits program. The Montgomery GI Bill was the first benefit program in the VA to be evaluated under GPRA. The pending evaluation report demonstrates the positive return on investment of the GI Bill to both the veteran and the nation. It also recommends a substantial increase in GI Bill benefits with enhanced program flexibility in order to keep the program viable in a rapidly changing economy and an environment of increasing costs of education. We in government are increasingly being asked to demonstrate the effectiveness and outcomes of the programs we administer. For SAAs the hope is that you will be able to strengthen your report of activities so that all levels of oversight can recognize the value you add to the veterans' education benefit program.

Finally, legislation is on the horizon that will provide a GI Bill for the 21<sup>st</sup> century. We, working as partners, VA, schools and SAAs, need to insure that we have a benefit and information delivery system for the 21<sup>st</sup> century as well.

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## C. Business Process Reengineering Charter

### Purpose

The Department of Veterans Affairs, Education Services Division, Business Process Reengineering (BPR) Team is established to assess DVA and selected partners roles and practices as they affect VA educational programs and recommend improvements and efficiencies in the delivery of services to veterans and their dependents and to ensure that benefits that have accrued to those who have earned them, and to their dependents, are received in a timely, accurate and compassionate manner.

### Responsibilities and Authorities

Three members of the BRP Team representing VA, State Approving Agencies, and educational institutions shall act as Co-chairs. The Co-chairs shall call all meetings, conduct the business of the BPR Team and shall oversee the establishment of, and progress toward accomplishing goals set by the team. The Co-chairs shall establish and secure a budget necessary for the conduct of the business.

### Membership

The membership of the BPR Team shall consist of representatives of organizations representative of the National Association of State Approving Agencies, the National Association of Veterans Program Administrators, Students eligible for and using VA educational benefits and the Department of Veterans Affairs, Education Services Division.

### CHARTER MEMBERS

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SIGNED THIS \_\_\_\_ DAY OF \_\_\_\_\_, IN THE YEAR 2001  
AT WASHINGTON, D. C.

## D. Results from Voting on Initiatives

<b>Ranking of Initiative</b>	<b>1 (5 Points)</b>	<b>2 (4 Points)</b>	<b>3 (3 Points)</b>	<b>4 (2 Points)</b>	<b>5 (1 Point)</b>
<b>Training</b> Total Points 25	0 (0)	1 (4)	2 (6)	4 (8)	7 (7)
<b>BPR</b> Total Points 40	6 (30)	1 (4)	0 (0)	1 (2)	4 (4)
<b>Technology</b> Total Points 48	3 (15)	6 (24)	1 (3)	3 (6)	0 (0)
<b>Approval</b> Total Points 57	6 (30)	2 (8)	6 (18)	0 (0)	1 (1)
<b>Outreach</b> Total Points 24	2 (10)	1 (4)	1 (3)	2 (4)	3 (3)
<b>Shift &amp; Change in Roles</b> Total Points 39	0 (0)	5 (20)	3 (9)	5 (10)	0 (0)

## E. Report on Education Outreach

The Education Service has ample evidence from customers and stakeholders that we need to expand and enhance our outreach efforts. We also have recent legislation as an additional driver (Public Law 105-368, Section 206, codified in title 38, chapter 30, section 3034(e)(1)). In response to this business need, we empowered a task force and performed an assessment of our current outreach efforts.

(After we began our assessment, the Program Evaluation by the Klem Group also emphasized a need for better outreach.)

Because we identified a number of different target audiences in need of outreach on education benefits, we developed an extensive outreach project plan. We haven't worked through all the details beyond FY 2000. The plan continues to evolve as new priorities arise.

Below we provide summaries of our current activities and our plans for FY 2000 and the future.

### Summary of Current Activities

This summary of current outreach activities the Education Service performs is categorized by target audience, as follows:

- ?? Active duty members
- ?? Recently separated veterans
- ?? Applicants for education benefits
- ?? Education beneficiaries
- ?? Education and training officials

### Activities Involving All Audiences

*Improving and Maintaining Internet Site.* All publications described below will also be formatted for the Internet. We'll continue to revise our Internet site to make it more user-focused based on comments we receive from users. Additionally, we provide copies of our pamphlets to the Department of Defense (DoD) education arm, Defense Activity for Non-Traditional Educational Support (DANTES), for publication on their Internet site.

**Testing.** We'll continue to conduct one-on-one protocol interviews and focus groups with readers of all above publications and our Internet site. Making improvements based on customer testing is one of the most critical activities we perform in outreach. The testing process helps ensure that we're staying in tune with our true audience.

The testing is not only valuable for improving the quality of our communications. Invariably through the testing process we receive insights on improvements in other areas of service.

Summaries of most of our tests are on the *h* drive, under *h/edu/22/outreach reports*.

### **Active Duty Members—Publications, TAP Briefings, and a TV Spot**

**Publications.** We produced in FY 1999 the following package, our first new outreach package targeted to active duty members:

#### **12-month letter and brochure**

- (1) The audience: Service members who have enrolled in the MGIB at the 12-month mark in their careers (the group specifically targeted by section 3034 of title 38).
- (2) The content:
  - ?? “welcoming” letter signed by our Director: “You’ve met the first requirement—now be sure to meet the others. See the brochure for more information.”
  - ?? brochure: basic eligibility criteria; most important exceptions; limitations (drawbacks of use while in service); length of eligibility period; amount of entitlement; reference to Web site, toll-free numbers (both Education and other benefits), and mention of home loans as another valuable benefit
- (3) The layout:
  - ?? single page letter
  - ?? single page 8 ½” by 11” brochure, tri-folded, glossy paper, colorful with two color background (red and deep blue), printed both sides
- (4) The frequency:
  - ?? Quarterly to all new eligible individuals (after an initial mass mailing to all potential eligible individuals currently on active duty)

We began mailing this package in September 1999, and sent packages to 239,000 service members. Although the majority of people who received the letter were correctly identified as members of the target audience, unfortunately many service members received the package in error.

We discovered problems with the selection criteria and with the validity of some of the data. Because of the volume of erroneous mailings, we stopped the mailings in order to correct the problems and ensure that future mailings do a better job of reaching the correct audience.

We resumed this activity in June 2000 with a test mailing to the 21,000 identified as newly eligible during the first quarter of 2000. We’re awaiting results and will refine the selection criteria if necessary before scheduling recurring quarterly mailings.

Total mailing and printing costs to date have been \$348,551. This represents printing 239,000 copies of the letter and 1.4 million copies of the brochure, and mailing 239,000 copies of the package.

**TAP Briefings.** As part of the VA participation in the Department of Defense (DoD) Transition Assistance Program (TAP) one member of the Education Service staff has served as an overseas representative. During FY 1999, he visited 10 military bases and made over 2300 outreach contacts in Japan and Korea. Since he began the program in 1993, he has visited over 50 military bases and made approximately 15,000 contacts in Europe and Asia.

Our representative provides information to service members on all VA benefits, and meets with military education counselors responsible for advising service members about VA education benefits. In addition to basic eligibility and payment issues, he also informs them of pitfalls that can cause potential beneficiaries to lose eligibility. Customer testing has shown this critical area to be one where information to the potential beneficiary has been particularly lacking.

**TV Broadcast.** On June 21, 2000, the Armed Forces Radio and Television Service aired a 2-minute segment from an interview with our Deputy Director, Dennis Douglass, on the MGIB. The broadcast was shown at all military installations. The Office of Public Affairs has videotapes, which they will send to the Education Service.

## **Recently Separated Veterans—Outreach Packages**

**Description.** The Education Service provides outreach packages to recently separated veterans through the VADs program. We send the packages to potential beneficiaries of the Montgomery GI Bill – Active Duty (MGIB– AD, or chapter 30) and the Veterans Educational Assistance Program (VEAP, or chapter 32).

Following is a brief description of each of those mailings. Each mailing is targeted to its audience through selection criteria identifying potential program eligibility. The mailings are sent 90 days after the veteran's date of discharge. Both the MGIB and the VEAP packages contain

- ?? a letter, encouraging veterans to use the benefits to obtain an education, giving information about the eligibility criteria, and describing how to apply for benefits.
  - ?? for MGIB, VA Form Letter 22-0594
  - ?? for VEAP, VA Form Letter 22-905
- ?? a pamphlet, providing detailed information about the program
  - ?? for MGIB, VA Pamphlet 22-90-2
  - ?? for VEAP, VA Pamphlet 22-79-1
- ?? an application for benefits (VA Form 22-1990).

**Number Distributed** In FY 99, we sent about 175,000 MGIB mailings. We do not have data on the number of VEAPs mailings.

**Cost.** Although we have data on the total cost of printing and distributing all VADs mailings (over \$528,000), we do not have the breakdown of costs for mailings by program.

### **Applicants for Education Benefits: Benefit Pamphlets**

When we receive an application for education benefits, we send the claimant the pamphlet that describes the benefit applied for (a requirement of Public Law 101-237, not codified in title 38). We publish six separate pamphlets: chapter 30, chapter 1606, chapter 32, chapter 35, section 901, and Hostage and Anti-Terrorism Relief Assistance. In addition, we publish a pamphlet on foreign training for those attending school overseas.

*The process.* Education clerks who establish the claim record or veterans service representatives who process the claims send the pamphlets. We're exploring the possibility of automating this process as part of our The Education Expert System (TEES) initiative.

Additionally, regional offices give pamphlets to potential beneficiaries who inquire about education benefits.

See Attachment 3 for a table showing the distribution of pamphlets in FY 1999. See Attachment 4 for data on costs of printing pamphlets and other outreach publications in FY 99.

### **Education Beneficiaries: Benefit Pamphlets**

In addition, after we've awarded benefits, we send the pamphlet described in the section above to the beneficiary (veteran, service member, reservist, or dependent). The law (Public Law 101-237) requires that we send the pamphlet "at least annually" thereafter while the individual receives benefits. As a result, claimants receive the pamphlet each year they're in training.

*The process.* We send the pamphlets to education beneficiaries yearly through two semiannual mailings. The Hines Benefits Delivery Center (BDC) extracts the beneficiaries from the active master records in spring and fall. Each spring extract is compared to the one from the preceding fall to ensure that a claimant does not receive the pamphlet twice in the same school year.

### **Chapter 35 Dependents—Special Mailings**

*Potential Beneficiaries.* Letters (called "school letters") and chapter 35 pamphlets are automatically generated from Compensation and Pension master records and mailed to children potentially eligible for chapter 35 benefits at ages 13, 16, and 18. An application for benefits is enclosed in the age 16 and 18 packages. [Need numbers]

Attachments to disability and death award letters and paragraphs within the award letters are also generated to notify potential beneficiaries about chapter 35 benefits. Original DIC awards and original awards to veterans 100% permanently and totally disabled from service connected conditions generate the pamphlets and applications for benefits (VA Form 22-5490). [Need numbers].

## **Education and Training Officials**

The Education Service and the Regional Processing Offices (RPOs) work closely with education and training officials to administer the program properly. These officials must stay current on a large body of information on education benefits.

Every training facility with programs approved for VA benefits has an employee who acts as a certifying official for VA education claims. The Education Service contracts with State Approving Agencies in each state to approve and monitor programs for VA benefits.

Additionally, the Department of Defense (DoD) determines eligibility for two of our programs (chapters 30 and 1606), and DoD education officials advise service members on VA education benefits. Department of Labor (DOL) officials oversee on-the-job training and apprenticeship programs in which VA beneficiaries participate.

Following is information on the different types of contacts we perform with these officials.

***Conferences.*** Each year the RPOs hold or their representatives attend conferences for school and training officials and State Approving Agency (SAA) officials within their jurisdiction, at both state and regional levels. They also host or attend national conferences with the National Association of Veterans Programs Administrators (NAVPA), the Association of Veterans Education Certifying Officials (AVECO), and the National Association of State Approving Agencies (NASAA). In addition, they also attend Department of Labor (DOL) and Department of Defense (DoD) conferences for training officials.

Representatives from the Education Service attend the national and regional conferences, including the DoD conferences. (This May the Service Director and a Division Chief and representatives from the Muskogee RPO attended the DoD Worldwide Education Symposium in Dallas, Texas.)

The following information is based on the best data currently available. During FY 99 the Education Service and the RPOs were represented at 65 school and DoD conferences with over 5,000 total participants attending. We haven't been able at this point to obtain complete data on total costs of these conferences.

***Liaison Visits.*** Education Liaison Representatives (ELRs) at each regional office conduct visits with training officials each year to provide information and assist with problems. During FY 1999, 1,112 visits were conducted.

***SAA Outreach and Liaison Activities.*** SAAs engage in many activities, which support VA education programs, including outreach and liaison. Outreach for SAAs is defined as follows: 1)Any activity designed to inform or encourage those with education entitlement to use it. 2)Any activity which encourages potential providers (training facilities) to become approved and to recruit users.

In their quarterly report to VA on their contract, the SAAs take one count for each activity or project that is designed and sponsored by the SAA to increase usage of the MGIB. During FY 1999 the SAAs reported 7,847 outreach activities performed.

Countable activities include mailings, meetings, mass faxing, presentations, interviews, participation in job fairs, and cold calls to establish apprenticeship and on-the-job training programs. Contacts include participants at TAP briefings, Reserve Center and National Guard officials, DoD Education Service Officers (ESOs), high school guidance counselors, and employers.

The Missouri SAA has produced a 15-minute video and several short radio announcements, used in their local area, on using the MGIB for on-the-job training programs. Oklahoma's SAA has been active in providing briefings to soon-to-be discharged service members through the TAP program.

***Publications.*** We developed in April 2000 a brochure titled "Helping Service Members Get a Good Education," which was handed out at the Worldwide DoD Conference. It is geared to military and other education professionals who deal with VA education benefits.

## **Summary of Plans for FY 2000 and the Future**

Section 3034 targets active duty members who have had the \$1,200 pay reduction for MGIB. But the law goes further, providing that we use our discretion to furnish the application forms and “other educational materials” to training facilities and military education personnel.

Following is a summary of our current and future plans for outreach activities categorized by targeted audience. As we said earlier, the plan is by no means finalized. It continues to evolve as new priorities and needs develop. Timelines are not yet set for all activities.

### **Active Duty Members—Publications, TAP Briefings, Media Releases**

#### **Publications**

##### **12-month letter and brochure.**

We’ll continue mailing the 12-month package quarterly to newly eligible service members. We’ll continue to revise the content and layout based on customer testing.

##### **Two-year letter and brochure**

The audience: The same service members who received the 12-month package at around the two-year point, when they can become eligible for benefits

?? The content:

- (1) letter: congratulating service member for reaching second eligibility point for MGIB; explaining drawbacks of using benefits in service; encouraging to begin thinking seriously about financing education
- (2) brochure: repeating highlights of MGIB as in 1), but focusing on questions related to using benefits in service; difference in payments from payments they can receive after discharge; issues to consider for deciding on education program and financing education; being prepared for smooth process upon discharge

?? The layout:

- (1) letter: same as in for the 12-month letter
- (2) brochure: 2-3 page brochure

### 1) Near discharge letter and pamphlet

1. The audience: The same service members as in 1) within 3 months of discharge
2. The content:
  3. letter: encouraging to use MGIB early after discharge (so as not to let benefit run out before overtaken by other priorities); enclosing application; reminder of importance of completing obligated period; emphasizing how easy it is to apply and referring to enclosed pamphlet for more detailed information than we've sent previously
  4. pamphlet: More detailed information on MGIB eligibility, emphasizing completing obligated period and honorable discharge; more exceptions to eligibility than in previous brochures; length of eligibility period, entitlement usage, how to get payments started (almost the same as current MGIB pamphlet, but more reader-focused and minus some of the detail on receiving benefits while in school)
5. The layout:
  6. letter: same as in 1)
  7. pamphlet: 10-15 page booklet, full matte coated colorful cover

### 1) "Specialty" pamphlet for those without high school diploma

1. The audience: Service members who have not completed their first period of service and do not have a high school diploma
2. The content: reminder that you may qualify for MGIB if you complete high school diploma or equivalent or 12 college credits before completing 1<sup>st</sup> period of service; encourage to seek guidance; value of MGIB for future
3. The layout: One-page threefold brochure printed front and back; semi gloss paper, colorful background

### 1) "Specialty" pamphlet for those with "kickers"

1. The audience: Service members who qualify for "kickers"
2. The content: Explaining how "kicker" works in combination with Army College Fund, understanding need to apply for MGIB; drawbacks of using while in service
3. The layout: One-page threefold brochure printed front and back; semi gloss paper, colorful background

***TAP Briefings.* We're reviewing available materials used on education benefits at TAP briefings. We'll develop a standard package of slides and handouts, and possibly a video. All military service coordinators, SAA representatives, and others who give presentations on education benefits can use these materials.**

***Media Releases.* We've produced two write-ups which Public Affairs has used for the TV Broadcast mentioned on page 3 in the Summary of Current Activities. They're also**

**coordinating with military news organizations to use the pieces for military base newsletters.**

**We'll continue to provide items for press and broadcast releases for military and veterans service organizations newsletters.**

### **Recently Separated Veterans—Outreach Packages**

*VADs letter and pamphlet:* The current MGIB letter (VA FL 22-0594) was tested in focus groups and one-on-one protocol interviews with service members participating in Transition Assistance Preparation (TAP) briefings at the Naval Air Station in Norfolk, Virginia. The service members identified significant problems with tone and content.

Additionally, almost all service members we've tested have commented that receiving the letter three months after discharge is too late. Most indicated they need to receive the information about three months *before* discharge, in order to begin planning for their education. Many said a simpler "reminder" type mailing three months after discharge might be more useful.

In response to these comments, the Education Service is planning to develop a "near discharge" mailing described below. Additionally, we will substantially revise the VADs mailing. Instead of the current benefit pamphlet, we will develop a streamlined pamphlet to serve as a reminder about using their benefits before they expire in 10 years the different types of training they can receive benefits for, and how to get payments started, with the Internet address and toll-free numbers for contact information.

We eventually plan to revise all current benefit pamphlets. We plan to streamline each pamphlet to target it more closely to the audience we've identified for distribution at the appropriate point in their lives in relation to education benefits.

The VEAP VADs letter has not yet been tested, since the audience is much smaller and more difficult to locate. However, since its content is almost identical to the MGIB letter, except for eligibility criteria, we feel we may be able to significantly improve the letter through similar revisions.

### **Applicants for Education Benefits: Publications**

We'll revise the current pamphlet sent to applicants for benefits, streamlining it to provide information on

- ?? What happens next on your claim
- ?? What happens if you change enrollment
- ?? What to do if you don't get a payment or verification form
- ?? How you can get counseling, and how counseling can help you
- ?? How to avoid or minimize overpayments
- ?? How to contact us (Internet and toll-free phones)
- ?? How to get work study allowance

?? How to get tutorial assistance.

## **Education Beneficiaries**

1. The audience: Veterans and service members who are receiving benefits
2. The content (same as for applicants):
  3. What happens if you change enrollment; What to do if you don't get a payment or verification form; availability of counseling; How to avoid or minimize overpayments; referring to Internet; how to get work study allowance; how to get tutorial assistance
4. The layout: 5-6 page pamphlet, matte coated, colorful cover

We're also developing flyers promoting the initiatives on telephone and Internet attendance certification.

*Chapter 35 Dependents—Special Mailings.* We'll work with the C&P Service to review the special mailings sent to potential chapter 35 beneficiaries. We'll collaborate on revising them to be more reader-focused.

## **Education and Training Officials**

These needs are still being assessed. We'll make the brochure used for the DoD Worldwide Education Symposium into a permanent publication as a resource for conferences.

*Education Service Officers and Military Education and Career Counselors.* We're also currently working on a training handbook for Education Services Officers, based on their comments in recent focus groups.

1. The audience: Military Education Service Officers and Career Counselors, Directors of DoD Education Centers, some school officials
2. The content: Pamphlet: highlights of MGIB eligibility, entitlement, eligibility period, glossary of some VA education terms; how payments work; examples of payments in service; prorated entitlement charges; some of most common "problem-case" questions
3. The layout: Still being determined

In addition, we're working with SOC (Servicemen's Opportunity College) to assist them in developing content for brochures they will provide military installations on education benefits.

Finally, we're developing flyers promoting the initiatives on Internet certification of enrollment.

***Recruiting Officials.*** Based on a recent request from a recruiting official, we are developing a slide presentation to be used for training recruiter instructors. We will pilot the presentation this fall at the Navy Recruiting School in Pensacola, Florida.

## **F. SAAs Assist VA in Conducting Compliance Surveys**

### **ISSUE: SAAs Assist DVA in conducting compliance surveys**

#### **As Is / Current Status**

DVA conducts compliance surveys at a prescribed number of schools and training establishments. The purpose of the surveys is to confirm that these facilities are, in fact, providing approved education or training and that education benefits are properly disbursed to veteran students in accordance with all applicable laws and regulations. In effect, they are designed to verify the propriety of payments made to veterans. They also afford DVA an opportunity to provide assistance in understanding, interpreting, and conforming to these laws and regulations. While these surveys are the responsibility of DVA, in a number of states the VA has entered into partnership with the SAA to assist in conducting either all or part of the required surveys. In these instances, the SAA conducts only the fieldwork; DVA completes the remainder of the survey and retains overall responsibility for the conduct of the survey. No matter who conducts the survey, discrepancies involving approval criteria are referred to the appropriate SAA for corrective action. Discrepancies involving anything other than approval criteria must be addressed by DVA resources.

According to terms of the reimbursement contract, each SAA is required to conduct supervisory visits to approved schools and training establishments within their jurisdiction. In scheduling these visits, the SAA coordinates its activity with the schedule of compliance surveys to minimize overlap of these oversight efforts. Supervisory visits are made to schools or training establishments which have a veteran or eligible person enrolled. The purpose of these visits is to determine that approved courses or programs continue to meet approval criteria. This is a wide topic, but generally includes such items as ensuring the school is following approved policies, ensuring veterans are treated equally (i.e. tuition), and ensuring the school is enrolling veteran students only in approved programs. During these visits, the SAA provides the assistance necessary to assure education and training opportunities offered to the customers are consistent with approval criteria, are bona fide, and the facility remains in compliance with other applicable laws and regulations. While on site, the SAA may take additional measures to assist veterans and other eligible persons who may have questions or problems with benefit payment. The SAA also performs “inspection visits” to new schools or training establishments seeking approval or re-approval after a period of inactivity. At the request of DVA, the SAA will also assist facilities to investigate and address customer complaints. The SAA is required to provide a written report of all visit activity, by type of visit, to DVA.

#### **Proposed Partnership**

The recommendation of this subcommittee is that SAA involvement in compliance surveys should be expanded to all states where appropriate. As evidenced by the current partnership and contract between DVA and SAA, State Approving Agencies are heavily involved in supervision and oversight responsibilities. In

general, oversight activities are best left to states and various local entities. Overall responsibility for compliance surveys must remain with DVA; however, each SAA could assist DVA by conducting the fieldwork for compliance surveys. This involvement in compliance surveys changes the role for the SAA by expanding the level of oversight activities performed by the SAA and expanding the partnership agreement between DVA and SAA.

#### **Advantages of SAAs assuming this function**

- ?? Will eliminate areas of duplication of oversight effort; SAA supervisory visits include, as a component, activities found within DVA compliance surveys.
- ?? Will allow DVA to focus on payment issues while ensuring the vital oversight role (compliance survey) is accomplished; will free up DVA compliance survey specialists to conduct other functions.
- ?? Will further define the SAA roles for VA and Congress; will give the SAA a very visible role in oversight.

#### **Disadvantages of SAAs assuming this function**

- ?? The roles of the SAA are currently defined by the contract and constitute a full-time workload; most SAAs are already overworked and do not have staff or resources for a new role.
- ?? It will be difficult for the SAA to find the time and resources to conduct compliance surveys based on the current funding levels and contract requirements. The SAA would have to give up other core responsibility; compliance surveys would be conducted at the expense of approval activity and supervisory visits.

#### **Barriers to SAAs assuming this function**

- ?? Some SAA offices do not have the expertise to assume this role.
- ?? Some SAA personnel may resist changes that include conducting compliance surveys.
- ?? Some DVA personnel will view the new role of compliance surveys for the SAA as a threat.

#### **What has to happen for SAAs to assume this function**

- ?? Determine which SAAs are interested.
- ?? Determine which SAAs are capable.
- ?? Determine how to implement the new function into the SAA responsibility. This should not require legislation; the best mechanism is through the contract.
- ?? Locate the resources to staff this activity; determine what SAA activities will be reduced and how.
- ?? Establish a long-range training plan (SAAs must be formally trained to conduct this function).
- ?? Establish a review and oversight plan.

## **G. Detailed Recommendations by Project Team**

### **E-approval Team**

**(Danny Stewart, Team Leader; Mike Ball, George Summerside, Wilbur Turner, Ralph Debar, Pat Hayden, Faith Stellitano, Michele Bowles)**

VBA should invest in the development of an on-line approval system that will incorporate all of the components of the current OLAF system, LACAS system, and other system approval files. This approval system should be web based and provide for access to schools, veterans and the general public. Specifically, this proposal would:

- ?? Provide schools, job training establishments, licensure and certification organizations, SAAs, veterans and other eligible persons, and the general public with inquiry access to approval records and the ability to search the records;
- ?? Provide schools, job training establishments, and licensure and certification organizations with the ability to enter applications and modification requests and a mechanism for the system to notify SAAs that a request is pending;
- ?? Provide SAAs with the capability to add new records and modify existing records for schools, job training establishments, and licensure and certification organizations in their jurisdiction;
- ?? Provide SAAs with the capability to return incomplete or unacceptable approvals to the school, job training establishments, and licensure and certification organization;
- ?? Provide ELRs with the capability to review SAAs approvals and revisions and conduct additional reviews and adjustments as required;
- ?? Provide ELRs with the capability to return incomplete or unacceptable approvals to SAAs;
- ?? Provide SAAs with the capability to generate the Quarterly Report of SAA Activities and to transfer the reports to ELRs or the Education Service electronically;
- ?? Promote the standardization of approval information among all SAAs and ELRs;
- ?? Reduce the amount of time required by SAAs and ELRs to maintain current approvals;
- ?? Ensure that completed and accurate information is entered into the records by identifying required fields and developing system edits and consistency checks.

## **BPR Reports Team**

**(J.D. Dillingham, Team Leader; Brian Clark, Stephen Dillard, Pat Hayden, Jim Little)**

Expand the definition of a program of education to include any continuing education training necessary to meet and retain “Career Goals”.

Eliminate the need for students to provide mitigating circumstances.

Eliminate the requirement for the school to report to the VA the amount of credit allowed for previous training or experience.

Revise practical training to include non-accredited courses and clarify approval criteria.

Simplify training time measurement decisions.

## **Roles of VA, SAAs and Schools Team**

**(Jim Little, Team Leader; Mike Ball, Mike Seymour, Doug Smith, Ted Van Hintum)**

Any modifications to the Program Approval should retain the responsibility for SAA approval of accredited and non-accredited programs; should recognize the inherent qualities added by the accreditation process; should recognize accreditation and approval are different processes. It is not in the best interest of the veterans, other eligible persons, DVA, or the states to remove the responsibility for Program Approval or to move that responsibility from the SAA. If the role of Program Approval is modified, training and financial support will be required. If Program Approval is changed, the law and the contract must accommodate the changes.

Where possible, allow a combination of DVA and SAA responsibility for Compliance Surveys. SAAs can augment DVA Regional Processing Offices with Compliance Surveys where manpower, experience, and capability exist. When Compliance Survey responsibility is added to SAA responsibility, cost and resources accommodations must be considered.

Outreach and Liaison are greatly needed in the Educational Benefits program to promote the use of the MGIB. Since SAAs are located within each state, they have an understanding for what is needed in each state and can respond locally. Support for increased Outreach and Liaison will need contract changes and funding.

Technical Assistance is an absolutely necessary responsibility of the approval process. The execution of the responsibility is charged to the SAAs. Technical Assistance must be continued and additional efforts will be required along with additional efforts in Training.

The need for training, and the increase in the need for training, should be recognized. Training is a responsibility shared among DVA, SAA, and the schools. With the reduction of DVA personnel new methods of providing training must be found. SAAs can assist within the states but will need time, cost reimbursement, and modification from the contract. Electronic methods can also assist.

It is imperative that the agencies involved in the Licensure and Certification (DVA and SAAs) work together to execute the program; to ensure veterans and other eligible persons are served; that costs and time requirements for the new program are managed and accommodated.

## **Information Technology Team**

**(Hampton Fox, Team Leader; Les Bakke, Michele Bowles, Ralph DeBar, Faith Stelitano, Danny Stewart)**

It is recommended a Chief Information Technology Officer in the Education Service and at each RPO (Regional Processing Office) is needed to coordinate education technology initiatives.

It is recommended a comprehensive review of TEES needs to be conducted to ensure it address all issues that field VA staff, SAAs and schools believe needs to be considered.

It is recommended a web portal expanding upon the [www.gibill.va.gov](http://www.gibill.va.gov) web site and providing “one-stop shopping” to veterans, schools and SAAs should be developed.

It is recommended that VACert needs to be transported to an Internet based application and its use should be mandatory if an IHL or NCD facility with 10 or more VA students wishes to participate in the training of veterans and their dependents.

It is recommended that Electronic Signature (E-SIGN) and/or Public Key Infrastructure (PKI) be used to provide system security for access of information by our customers.

## Outreach Team

**(Dave Guzman and Stephen Dillard, Co-leaders; Ralph DeBar, J.D. Dillingham, Mike Seymour, Ted Timmerman)**

That the VA aggressively and completely implement the initiatives described in the “Report on Education Outreach” dated June 27, 2000.

That the VA advertise in letters and pamphlets, and provide a link via its website, to databases listing those programs approved for the use of VA educational benefits.

That the VA Education Service offer the RONA free-of-charge to all **SAAs** and applicable schools requesting it, for use as a tool to recruit students for VA approved educational programs.

That the highest level of the VA work with DOD, DOL and DE counterparts to establish a formal and regular line of communication and oversight to provide the cooperation necessary to adequately inform active duty service members and veterans of their VA educational benefits before and after separation from the service.

That the Secretary aggressively pursues legislation to reinstate VEOP (Veterans Education Outreach Program). The funding would subsidize efforts by schools to actively seek out veterans in the community who have entitlement to the MGIB who, for whatever reason(s), may not be aggressively pursuing a college degree/career enhancing opportunity. Restoring VEOP would assist the Department of Veterans Affairs in making the MGIB a viable option for many thereby assisting the veteran in becoming a better educated and informed citizen while increasing the success of the MGIB as a recruiting, retention and readjustment program.

Public Law 107-103 requires that State Approving Agencies (SAAs), in addition to VA, actively promote the development of VA programs of training on the job (including programs of apprenticeship). Also requires SAAs, in conjunction with outreach services furnished by VA for education and training benefits under chapter 77 of title 38 USC, to conduct outreach programs and provide outreach services to eligible persons and veterans about education and training benefits available under applicable Federal and State law. This public law supports the outreach system that is currently needed.

## **Training Team**

**(Faith Stelitano, Team Leader; J.D. Dillingham, Dave Guzman, Danny Stewart)**

Develop training manual(s), activities, and communication vehicles to assist all VPAs (Veterans Program Administrators) to stay abreast of processing requirements, technology and regulatory changes. National, regional and state organizations/associates stand ready to provide the vehicle for delivery of training programs. This committee recommends the development of training standards to administer a "National Program". This program will develop courses syllabus, etc. to be used by all VPA associations for training. NAVPA, in cooperation with the DVA and NASAA, conducts an annual six-hour basic training workshop to train new certifying officials. This recommendation is to have this material ready for the next basic training workshop to be held in Denver, CO in October 2002. This program should be expanded to include OJT and Apprenticeship training.

Request funding to reinstate the Veterans Education Outreach Program (VEOP) to assist and encourage educational institutions to participate in electronic certification and transmission, outreach and enhanced training.

Develop an electronic web based certification system that processes all chapters and programs and implement a plan to require the use of this system within three years for all VA educational programs.

The DVA develop a public awareness-training package for college and university leadership. It is suggested that this training package be promoted through the professional associations of collegiate such as the National Association of Student Affairs Offices and other national associations of which presidents, vice presidents, chancellors, provosts, and vice provosts align themselves with for professional development. Mandate that the reporting fee be used for training on an annual basis because of the many changes imposed by changes in public law each year.

DVA should review policy and procedures associated with processing educational, OJT and apprenticeship claims with a view toward eliminating and/or redefining their purpose. Where technology or a new program is introduced, the old procedure/process/policy should be eliminated. New policy and/or procedures should be developed for new programs so that certifying officials would have a clean understanding of process and not have to untangle old practices.

**H. State Approving Agency Statement on Accreditation**