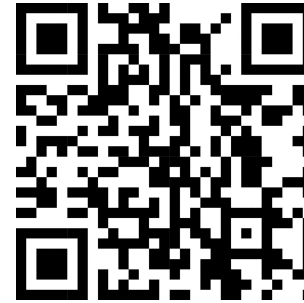


Isakson/Roe & Beyond

This presentation is available online at;
tinyurl.com/Beyond-Isakson-Roe



The URL and QR code will be provided again at the end of the presentation.

Isakson/Roe & Beyond

Oklahoma Department of Veterans Affairs
State Approving Agency

A brief history of Isakson Roe



- Started as H.R.7105 — 116th Congress (2019-2020)
- Formal name Public Law No: 116-315 Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020
- passed and signed into law on 01/05/2021

What Isakson Roe changed

- Oversight requirements
- School processes
- Restoration of Entitlement
- COVID-19 Pandemic Assistance
- Various topics not related to Educational Assistance

Subsequent laws that amend Isakson & Roe

- Public Law No: 117-16 Training in High-demand Roles to Improve Veteran Employment Act (THRIVE Act)
- Public Law No: 117-68 Colonel John M. McHugh Tuition Fairness for Survivors Act of 2021
- Public Law No: 117-76 Responsible Education Mitigating Options and Technical Extensions Act (REMOTE ACT)

What we aren't covering



What we aren't covering

- Sec. 1001 Revisions to the Edith Nourse Rogers STEM Scholarship program
- Sec. 1002 expanded eligibility for the Fry Scholarship
- Sec. 1003 Extended election period for Montgomery GI Bill®
- Sec. 1004 The eventual sunset of Montgomery GI Bill program in 2030
- Sec. 1006 expanded qualifying work-study activities
- Sec. 1007 & 1021 return of entitlement due to school closure
- Sec. 1008 updated Yellow Ribbon terminology to be consistent with laws

What we aren't covering

- Sec. 1009 clarification of educational assistance used while on active duty
- Sec. 1011 expanded list of qualifying dependents for transfer of entitlement
- Sec. 1023 SAA conducts outreach activities
- Sec. 1024 Prohibits SAA from being colocated with a university
- Sec. 1025 eliminates the 12-year cut-off for VR&E if discharged on/after 1/1/13.
- Subtitle B - Pandemic Assistance (Sec. 1101-1108)
- Any part of Title II-VII of Isakson/Roe



What we are covering

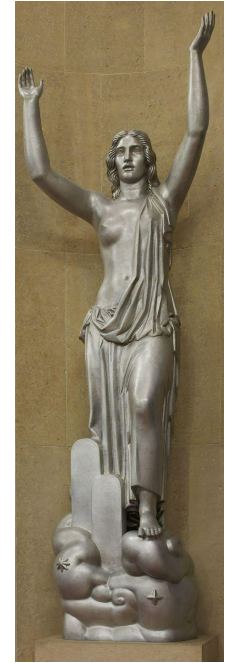
What we are covering

- Sec. 1005 Changes to in-state tuition requirements at state schools
- Sec. 1010 Changes to certification requirements/practices
- Sec. 1012 Expands disapproval criteria
- Sec. 1013 Establishes Risk-based surveys
- Sec. 1014 Increased oversight of institutions subject to government action
- Sec. 1015 Accredited institutions must participate in Title IV

What we are covering

- Sec. 1016 Law program accreditation
- Sec. 1017 Failure to comply with a risk-based survey
- Sec. 1018 New approval, oversight, and quality assurance components
- Sec. 1019 Changes to debt management processes
- Sec. 1020 Clarifies limitations on advertising
- Sec. 1022 Changes in profit status require a Risk Based Survey

Oversight and accountability



Oversight and accountability

- Sec. 1012 Expands disapproval criteria
- Sec. 1013 Establishes Risk-based surveys
- Sec. 1014 Increased oversight of institutions subject to government action
- Sec. 1015 Accredited institutions must participate in Title IV
- Sec. 1016 Law programs accreditation
- Sec. 1017 Failure to comply with a risk-based survey
- Sec. 1018 Provides enforcement measures for deceptive activities
- Sec. 1020 Provides enforcement measures for limitations on advertising
- Sec. 1022 Changes in profit status require a Risk Based Survey

Sec. 1012 Expands disapproval criteria

“An educational institution that is at risk of losing accreditation shall not be deemed to be approved.”

Sec. 1013 Establishes Risk-based surveys

- Performed by the State Approving Agency
- Highly focused on patterns of risk
- Prevent time consuming and expensive problems
- Mitigate risk before losses become significant

Sec. 1014 Increased oversight of institutions subject to government action

Institutions will be subject to a Risk Based Survey if;

- Placed on heightened cash monitoring level 2
- Has been subject to punitive actions by any State or Federal agency
- Loses or at risk of losing accreditation, includes probation, suspension, and show cause

Sec. 1017 immediate disapproval if an institution fails to comply with a risk-based survey

Failure to participate in a Risk Based Survey or to secure an affirmation of approval following a Risk Based Survey is cause for immediate disapproval.

Sec.1015 Accredited institutions must participate in Title IV

Accredited institutions must be able to produce a current Title IV Program Participation Agreement (PPA).

- PPA status check, download, etc. can be found at; <https://eligcert.ed.gov/>

Or

The institution must have applied for and received a waiver from the VA.

Oversight and accountability

Sec. 1016 Law programs must be be accredited by a specialized agency/association

The American Bar Association is the **ONLY** such organization that is currently recognized.



Sec. 1018 Provides enforcement measures for deceptive or aggressive recruitment activities

Misrepresentation, persistent unsolicited contacts, same-day recruitment and registration, and inducements are cause for;

- A warning to be published on the VA's website
- Disapproval

Sec. 1020 Provides enforcement measures for limitations on advertising

- Enforcement agreement With Federal Trade Commission
- Establish a process for making preliminary findings and final determinations
- Defines enforcement processes, review procedures and standards for reinstatement of approval

Sec. 1022 Changes in profit status require a Risk Based Survey

A for-profit educational institution that on or after the date of enactment is converted to a nonprofit educational institution is subject to a Risk Based Survey.

Changes to school processes



Kid Rudnick 3: *"Why do shows have episodes?"*



Grandpa Rudnick: *"Because, most problems are just a collection of small issues that can be solved in a series."*



Kid Rudnick 2: *"Big problems..?"*



Grandma Rudnick: *"Get solved the same way."*



Kid Rudnick 1: *"But, big problems get a movie."*

Changes to school processes

- Sec. 1005 Changes to in-state tuition requirements
- Sec. 1010 Changes to certification requirements/practices
- Sec. 1018 New approval, oversight, and quality assurance measures
- Sec. 1019 Changes to debt management processes
- Sec. 1020 clarifies limitations on advertising

Changes to school processes

Sec. 1005 Changes to in-state tuition requirements

State schools may not charge chapter 30, 31, 33, or **35** beneficiaries more than the resident rate.

- Chapter 35 is now included.
- Is now effective regardless of when a veteran was discharged.

Changes to school processes

Sec. 1010 Changes to certification requirements/practices -Dual Certification-

- Initial certification
 - Submitted after the beneficiary enrolls
 - Up to 180 days before the start of term, or;
 - Up to 1 year after the last day of the term
- Subsequent verification certification
 - Submitted after add/drop date, or;
 - Between 30 and 60 days after the first day of the term

Changes to school processes

Sec. 1010 Changes to certification requirements/practices -Monthly verification by Ch 33 Post 911 beneficiaries-

- Performed by the student, **not** by school officials.



Via Text Message (student must opt-in when the VA texts them)



Via Email (if student opts-out of text or does not respond to the VA's text)



Students can call the education hotline for assistance.

Changes to school processes

Sec. 1018 New approval, oversight, and quality assurance measures

- Personalized Shopping Sheets
- Policy requirements
- Additional requirements



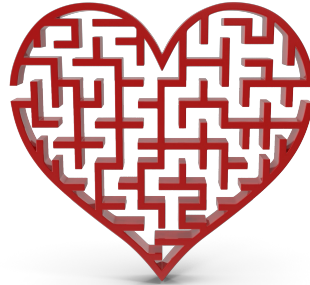
Changes to school processes

Sec. 1018 New approval, oversight, and quality assurance measures -Personalized Shopping Sheets-

- Estimated course cost
- Estimated cost of living
- Amount covered by VA
- Federal financial aid
- Aid offered by the institution
- Estimated student loan debt
- Graduation rates
- Job-placement rates
- Transfer credit
- Other relevant information

Changes to school processes

Sec. 1018 New approval, oversight, and quality assurance measures
-Personalized Shopping Sheets-



The Department of Education form,
[The College Financing Plan](#) meets these requirements.

Changes to school processes

Sec. 1018 New approval, oversight, and quality assurance measures -Policy Requirements-

- Inform of the availability of Federal and institutional financial aid, and;
 - Alert to aid eligibility before arranging student loans or alternative financing.
- Prohibit automatic enrollment renewal.
- Ensure individuals approve their enrollment in each course.
- Accommodate service members who must be absent due to service.

Changes to school processes

Sec. 1018 New approval, oversight, and quality assurance measures -Additional Requirements-

- Provide graduation requirements.
- Designate a central point of contact.
- Do not use persistent or aggressive recruiting techniques.

Changes to school processes

Sec. 1018 New approval, oversight, and quality assurance measures -Applicability, waivers, & information-

- Becomes effective 8/1/22
- Institutions may request a waiver to section 1018 criteria.
- Some parts of section 1018 may not apply to institutions that use the Department of Education form, [The College Financing Plan](#).
- Find answers to your questions: [ODVA SAA section 1018 FAQ](#)

Changes to school processes

Sec. 1019 Changes to debt management processes

Tuition and fee (T&F) debts generated after 1/5/21 will be assigned to the institution.

- Based on the generation date of the debt, **not** the term date
- Does **not** consider the cause of debt
- Student may be indebted to the school for unpaid T&F balance

Changes to school processes

Sec. 1020 clarifies limitations on advertising

- Prohibits and defines misrepresentation
- Limits commissions, bonuses, and other incentives
- Clarifies record maintenance requirements

Changes to school processes

Sec. 1020 clarifies limitations on advertising -Misrepresentation-

Misrepresentation by the school, its reps, partners, etc. is **prohibited**. This includes; the nature of the program, accreditation, transfer credits, requirements, endorsements, facilities, equipment, faculty & staff, course content, charges, scholarships, policies, financial aid, institutional relationships, student placement, statistics, and more.



Changes to school processes

Sec. 1020 clarifies limitations on advertising -Incentives-

“No commission, bonus, or other incentive payment based directly or indirectly on success in securing enrollments or financial aid to any persons or entities engaged in any student recruiting or admission activities or in making decisions regarding the award of student financial assistance”

Changes to school processes

Sec. 1020 clarifies limitations on advertising -Records requirements-

- Maintain a complete record of all advertising, sales, or enrollment materials used for or by the institution over the last two-years.
- Record shall be available for inspection by SAA and VA.
- SAA will review samples during approval actions.



The laws discussed

[38 USC § 3672- Approval of courses](#)

[38 USC § 3675- Approval of accredited courses](#)

[38 USC § 3676- Approval of nonaccredited courses](#)

[38 U.S. Code § 3679 - Disapproval of courses](#)

[38 U.S. Code § 3696 - Prohibition on certain advertising, sales, and enrollment practices](#)

VA training resources:

[School Certifying Official Handbook \(On-line\)](#) The official guide for SCOs

[School Certifying Official \(SCO\) Training](#) The official training page for SCOs.

[Resources for schools](#) a one-stop shop for SCOs and school administrators assisting students with VA benefits.

[Education Service Webinars and Training](#) Office hours and other helpful training both past and current. **Note:** should not be used as a definitive source of information.

[School Certifying Official FAQs](#) basic info and clarification SCOs.

"GI Bill® is a registered trademark of the U.S. Department of Veterans Affairs (VA). More information about education benefits offered by VA is available at the official U.S. government Web site at <https://www.benefits.va.gov/gibill>."

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On the web:

<https://oklahoma.gov/veterans/education/state-approving-agency.html>

Isakson/Roe & Beyond

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tinyurl.com/Beyond-Isakson-Roe

