



Compliance Surveys

An Overview

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Disclaimer

The information in this presentation should be considered talking points for discussion and information sharing. More comprehensive information may be available through other VA resources. Information in this presentation was current and correct on the date given.



Overvie

Compliance surveys are routine reviews of schools and training facilities receiving funding from the Department of Veterans Affairs (VA) for approved education programs. During compliance surveys, VA or its agents review an institution's records to verify they are certifying correctly and maintaining proper documentation.



Learning Objectives



Recognize the legal requirements for compliance surveys



List the steps in the compliance survey process



Describe areas reviewed during a compliance survey

Legal

- Statutory Requirements
- Objectives
- Authority for Review
- Record Retention



Statutory Requirements

Public Law 114-315, section
411

Requires VA survey facilities with courses approved for VA education benefits and enrolling at least 20 eligible VA beneficiaries, annually.

38 USC
3693

Requires VA survey all facilities with courses approved for VA education benefits every two years.

38 USC 3693 allows for waiver of these requirements if VA determines:

“based on the record of compliance of such institution of establishment with all the applicable provisions of chapters 30 through 36 of this title, that the waiver would be appropriate and in the best interest of the United States Government.”



Compliance Survey



Verify propriety of payments
Confirm compliance with approval



criteria Assist school or training



officials



Determine deviations from responsibilities &



requirements Confirm action taken to correct

Authority for Review

38 U.S.C. 3690(c) Student records and accounts must be made available for review by authorized representatives of the government notwithstanding any other provision of law.

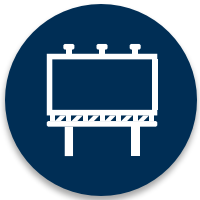
Buckley Amendment (PL 93-380) Requires student consent to release information from student records. Information sought in connection with an application for the receipt of financial aid is exempt. School records relating to VA benefits fall into the “Financial Aid” category and are exempt from the provisions of this amendment.



Record Retention



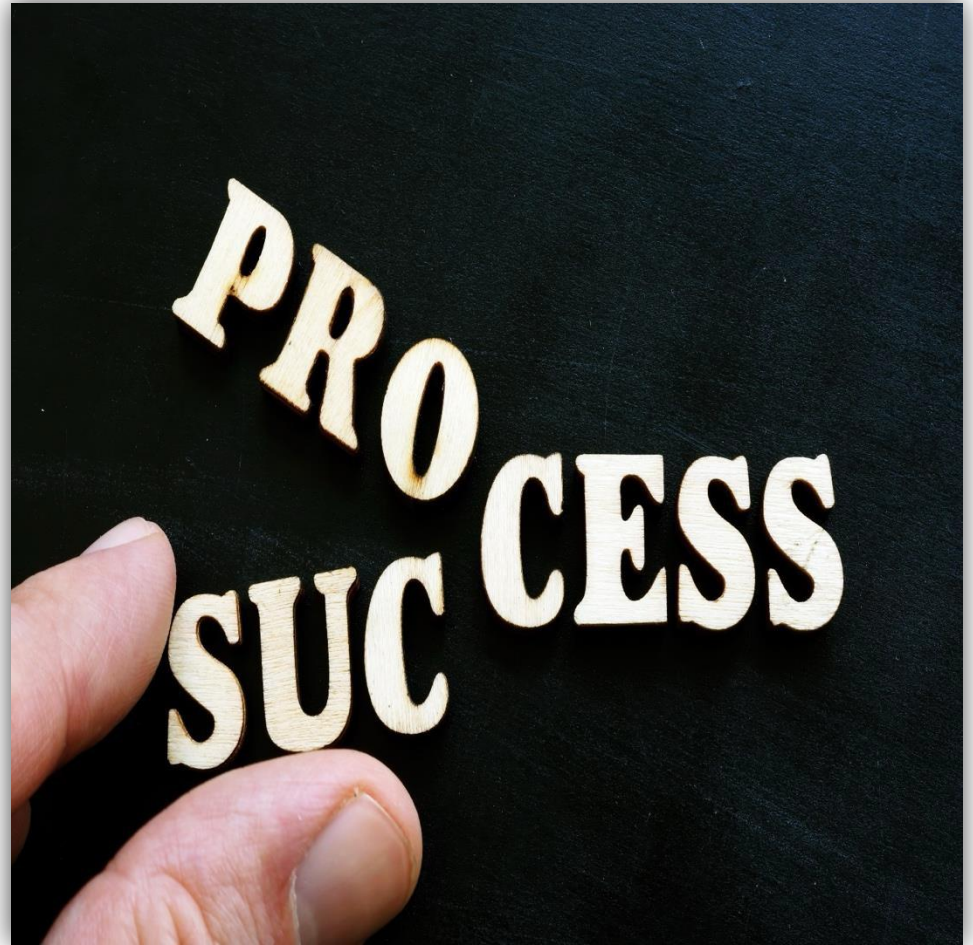
Student records must be retained for a minimum of three years from the end of the student's last enrollment period.



Advertising records must be retained for 12 months.

Compliance Survey

- Notification of Survey
- Survey Preparation
- Entrance Briefing
- Record Review
- Exit Briefing
- Notification of Findings

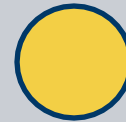


Step #1: Notification of

Notification via
phone or
email



VA shall provide not
more than 10
business days of
notice...



Survey
Notification Packet
sent

38 USC
3693



Notification

There will be several documents attached to the email:

- ✓ Notification letter
- ✓ Flight Compliance Survey packet
- ✓ Upload Portal instructions

Email notification to Facility about Compliance Survey

Send to: All SCOs shown in WEAMS

Subject: VA Compliance Survey Notification – Time Sensitive

Dear SCOs,

An onsite Compliance Survey has been scheduled for <School Name> on Tuesday, June 24, 2025. We plan to arrive at your campus at 9:00 am. with my colleague, ECSS. Please make us aware if there's anything which we need to request beforehand for parking, directions or building location, etc. If you are unable to attend that day, please provide the name of person who will attend in your place and provide the required documents and adequate workspace to conduct our review.

Included with this email are the following: the official school notification letter, a compliance survey packet describing all required documents to be provided for review and instructions on electronically uploading those files via the VA Education Portal prior to the visit. Please review these documents prior to the scheduled onsite visit and completion of the packet.

The Unique Identifier (UI) you will need to use to upload documents is XXXXXX

Let us know if you have any questions or need further assistance. Please upload all requested documents as soon as possible so a review of the documents can be conducted prior to coming on site. |

Thank you for your committed service to our Veterans and their dependents.

Sincerely,

<First and Last Name>

Education Compliance Survey Specialist



Notification Letter

[Click here to enter a date.](#)

NAME
TITLE
ETI
STREET ADDRESS
CITY, STATE ZIP

Facility Code: 1-1-1111-11

Dear Name:

ETI is scheduled to participate in a routine Department of Veterans Affairs (VA) Compliance Survey of VA beneficiary records. VA will be conducting the on-site education compliance survey visit on [Date](#) at [Time](#) [Time Zone](#).

WHAT IS THE PURPOSE OF A COMPLIANCE SURVEY

The VA conducts compliance surveys to ensure that approved programs adhere to applicable provisions of Title 38 United States Code (USC). The compliance survey review also allows VA to identify discrepancies and assist facility officials in better understanding their responsibilities and the procedural requirements of the VA.

WHAT TO EXPECT

Prior to the beginning of the survey, an entrance interview will be conducted with the designated School Certifying Officials (SCO) to discuss the purpose of the survey and procedures used.

After the review, the surveyor will again meet with the designated SCO(s) to discuss the survey results, including any discrepancies. The surveyor will address any questions and if applicable provide assistance.

STUDENT INTERVIEWS

VA Education Service would like to offer the opportunity for beneficiaries to participate in face-to-face interviews with the Compliance Survey Specialist. Your facility will need to provide a private workspace to use for these meetings. To ensure an opportunity for all beneficiaries to meet with the VA representative, please send the following email to all active VA education beneficiaries in advance of the site visit.

“A VA representative will be available on [Date](#), between [XX:XX](#) AM and [XX:XX](#) PM] to conduct individual interviews focusing on your experience at our school. You are encouraged to participate, but please note that participation is voluntary.

Remember: The Compliance Survey Specialist cannot assist with other benefits questions. If assistance is needed contact the VA Benefits Hotline at (800) 827-1000, Monday through Friday, 8:00 am to 9:00 pm ET.”

After the email is sent to all VA beneficiaries, please provide the surveyor with a copy of the email to add to the survey record.



Notification Packet



Records
checklist
for school
and
student
documents



Required
School
Informatio
n Form



School
Procedures
Questionnair
e



Compliance
Survey
Student List



Public
Law
116-315
Section
1018
Questionnair
e

*Authorization to Review Records document included for informational

Step #2: Survey

The **VA Education File Upload Portal** is used to securely transmit your documents to

VA by connecting to VA's Salesforce system, protecting sensitive student

Compliance Key

FY2 – 1111111 11928

5

9

Fiscal

Year

FY25

Facility

Code

1111111

Unique

Identifier

119289

Accepted File Types

.pdf (except Portfolio files)

.docx

.pptx

.csv

.xlsx

.jpeg

.png

.bmp

.gif

.tiff

.psd

.raw

.eps

Non-accepted File Types

.doc

.xlsm

.zip

.msg

.htm

Portfolio style .pdf files

.mp4



Survey Preparation Best

Documents should be clearly labelled and arranged according to the VA beneficiary to be reviewed.

Care should be taken when scanning documents to upload to the portal so blank pages are not included

A certifying official or other school official should plan to be available throughout the survey.

Certifying official should provide a detailed map showing how to reach their office and all pertinent school procedures, prior to the survey.

Certifying official should make certain all documentation requested is made available during the survey.

Copies should be provided on standard letter size paper (8.5 x 11 inches), printed on one-side, and free of staples – do not provide originals.

Certifying official should provide a legend for all codes (finance codes, course codes, etc.) and grades to the surveyor.



Step #3: Entrance



Advise of the purpose of the compliance survey



Make workspace arrangements



Arrange for student interviews and class visits



Plan for the Exit Briefing

Step #4: Record Review –

- ❖ Student Transcripts
- ❖ Financial Ledgers
- ❖ Degree/Program Requirements
- ❖ Enrollment Agreements
- ❖ Applications for Admission
- ❖ Prior Credit Evaluations

- ❖ Class Schedules, if applicable
- ❖ Attendance Records
- ❖ Course add/drop information
- ❖ Progress Records
- ❖ Remedial Test Scores
- ❖ Non-Veteran Records

Step #5: Exit Briefing



Discuss
discrepancies

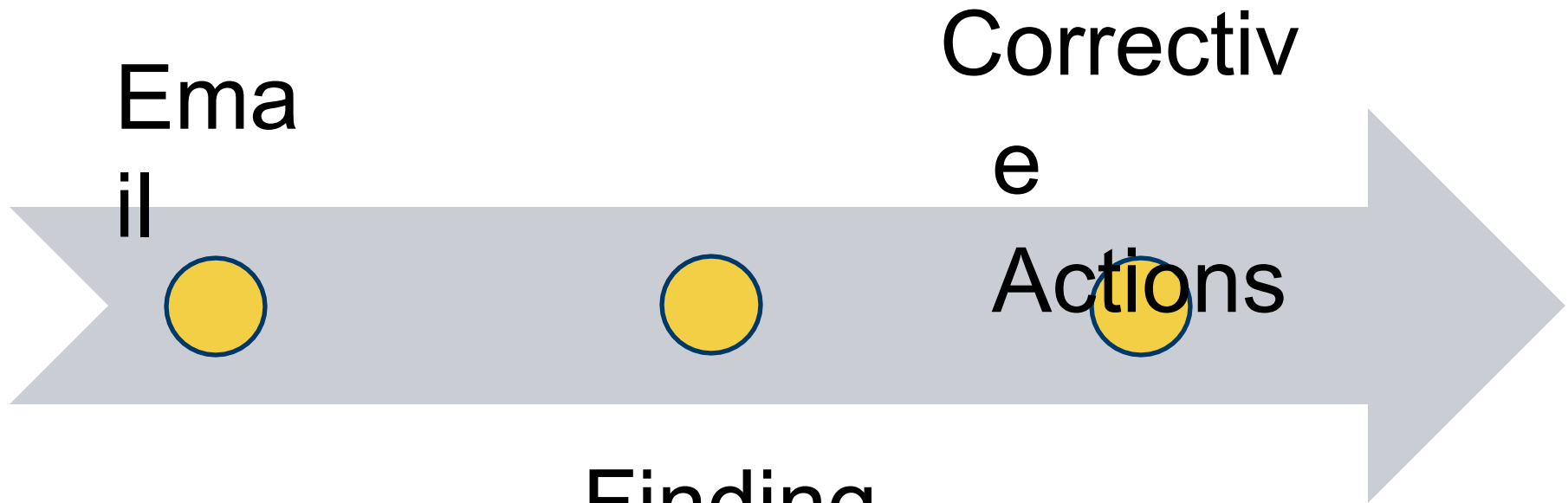


Provide opportunity to ask questions & provide
rebuttals



Outline corrective
actions

Step #6: Notification of



Finding

s

Letter



Areas of

- General Areas of Review
- Non-accredited Facilities
- Vocational Flight Schools
- Training Establishments
- Additional Areas of Review



Areas of Review



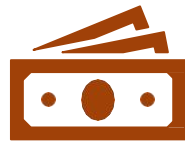
Accuracy,
Current,
Complete
Records



Tuition &
Fees
Certified



Credit for
Prior
Training



VA is
Last
Payer



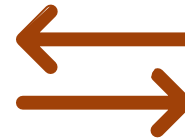
Prompt
Certification



Equity
of
Charges



Enrollment
Dates
Certified



Changes
in
Enrollment



Hours
Certified



Standards
of
Progress

Non-accredited



Course and facility policies are furnished to student



Enrollment is within limitations approved by SAA



Pro-rata refund policy is followed

Vocational Flight

Private Pilot

- License** Private Pilot courses can never be approved for VA education benefits at a vocational flight school.
- School records must show VA beneficiaries held an unlimited Private Pilot license or higher rating
 - issued under 14 CFR part 61 before enrolling in a flight training course at a vocational flight school. Copies of Private Pilot licenses must be kept for at least three years following the

Medical

- Certificates** Students must possess a minimum of a second-class medical certificate prior to the start of training for each flight training course, except Airline Transport Pilot, which requires a first-class medical certificate.
- VA education benefits will not be paid for any training if the medical certificate was issued after the start of the course.

Cost of Training

- Approved tuition and fee charges must be the same as the tuition and fee charges which similarly circumstanced non-Veterans enrolled in the same flight course are required to pay.
- School records must show VA beneficiaries paid their share of the cost of training received, and non - VA students paid 100% of the cost of training they received.



Training



Was the training agreement furnished to the VA trainee?



Are VA trainees training according to the approved program?



Are VA trainees receiving wages as approved by the SAA?

Additional Areas of



Repeat
Discrepancies



Independent
Study



Reporting Fees



Reporting Graduation
and Program
Completion

Advertising, Sales,
or Enrollment
Practices



Yellow Ribbon
Contract



Priority
Enrollment

1

Trademark



Summary



Recognize the legal requirements for compliance surveys



List the steps in the compliance survey process



Describe areas reviewed during a compliance survey

Resources

38 U.S. Code §
3693
38 U.S.C.
3690(c)
38 CFR §
21.4252
38 CFR §
21.4200
38 CFR §
21.4209(f)

Public Law 114-315 §
411 ACE Military Guide
Military Joint Services
Transcripts
Community College of the Air
Force Public Law 116-315 §
1020
Buckley Amendment (PL
93-380)

School
Certifyin
g Official
Handbo
ok



Question
s?