

What to Expect When You're Expecting a Compliance Survey

Tips & Tricks to a Successful Survey

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What We'll Cover

Types of “Audits”

Federal and State compliance surveys.

Official Notice

Understanding notification letters.

Gathering Information

Preparing student and school documents.

Uploading Documents

Using the VA's file upload portal.

Interviews & Briefings

Entrance interviews and exit briefings.

Final Report

Receiving and understanding findings.

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Types of Compliance Surveys

Federal Surveys

Federal surveys are conducted by the DVA or St. George to verify that institutions meet federal requirements for internal policies, student enrollment, attendance, and benefit usage.

- Focus on compliance with VA regulations and program rules
- Often triggered by routine oversight, complaints, or irregularities
- May include file reviews, interviews, and document verification
- Can result in corrective actions if issues are found

Typical frequency: Often periodic but may also occur as needed when the VA identifies a concern or requests additional review.

State Surveys

State surveys are conducted by the State Approving Agency (SAA) to ensure institutions remain approved under state guidelines and funding requirements.

- Focus on state approval standards and state-funded program compliance
- May review school eligibility, program structure, and reporting practices
- Can involve monitoring participation in state-supported benefits or grants
- May lead to follow-ups, findings, or approval updates

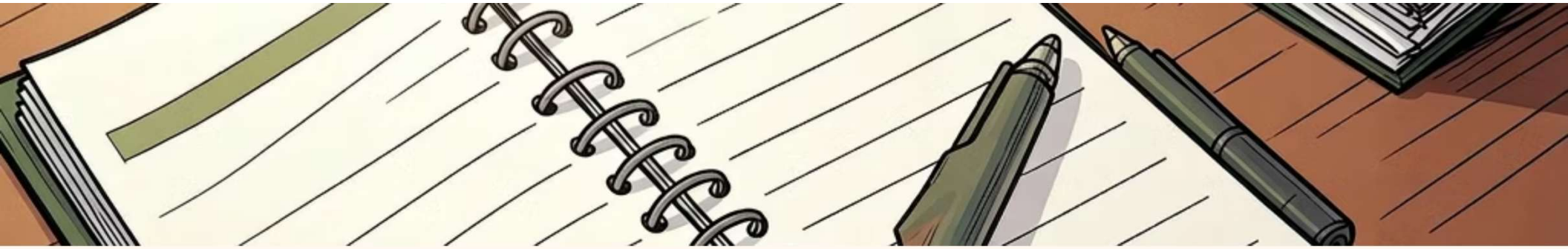
Typical frequency: Usually periodic or scheduled based on state oversight cycles, though reviews can also happen when issues are reported.

Key Difference

Federal audits primarily enforce VA compliance rules and laws, while state audits focus on state approval, funding, and program-specific requirements.

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Understanding the Survey Timeline & Preparation

Navigating a compliance survey requires a clear understanding of the process and proactive preparation. This phase outlines what to expect from initial notification through document submission.

Notification

Receive official communication from the VA outlining the scope and requirements of the survey. Notification can be 10 or 2 days, depending on the type.

Information Request

The VA will specify required student records and school policies for review.

Document Compilation

Systematically gather all necessary documents regarding enrollment, transcripts, academic progress, and operational documents.

Submission Window

Adhere to the given deadline for uploading all compiled documents to the VA portal.

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Official Notice: What to Expect

An official *Notification Letter* is sent via email to the primary school certifying official (SCO) before the survey. It typically includes:

- The scheduled date and time of the survey visit
- The survey purpose and an overview of what reviewers will be examining
- A list of required documents and records to prepare in advance
- Students selected for review and notes if interviews are part of the review
- Applicable laws and regulations for record review
- The required 10-day notice timeline before the survey

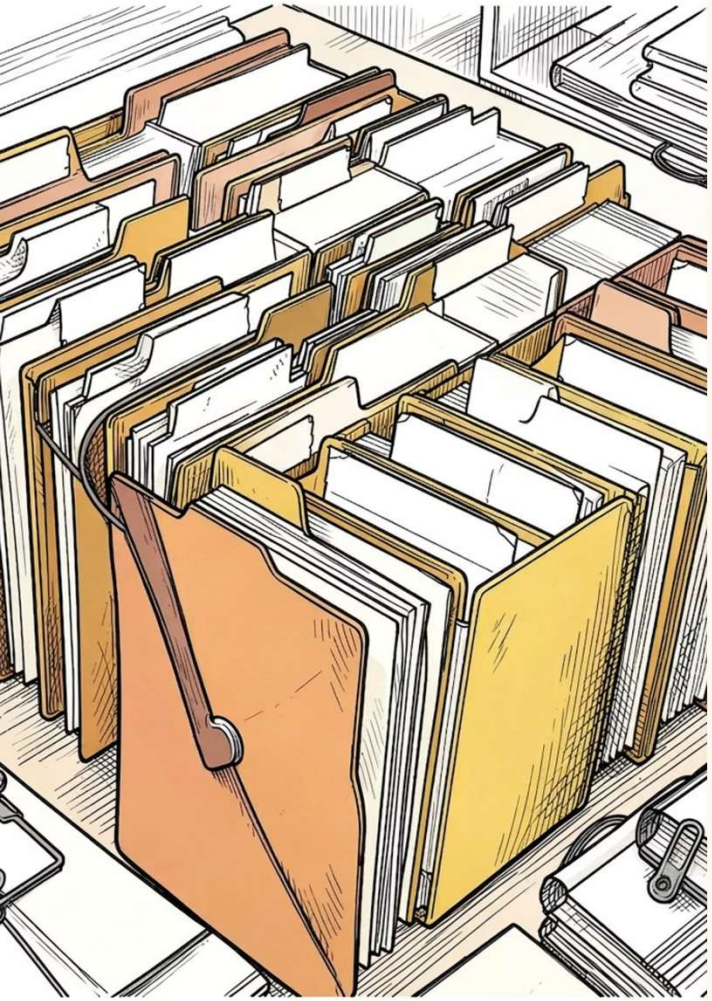
The 10-day notice requirement is important because it gives the school time to gather records, coordinate staff availability, and confirm that student files are complete and ready for review. SCOs should treat the letter as an action item, respond promptly, and begin organizing the requested materials as soon as they are received. ***Risk-based surveys only give a 2 day notice***.

VA conducts surveys to ensure adherence to Title 38 USC and assist facilities in understanding responsibilities.

Upon receiving the letter, SCOs should review the details carefully, verify the survey date, identify any missing documentation, notify relevant staff, and prepare a point of contact for the survey team.

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Gathering School Documents:

- **Tuition & Fees**
  - *Description of mandatory & course/degree specific fees.*
- **Academic Year Calendar**
  - *Back three academic years.*
- **Title 38 USC 3679(e) Compliance**
  - *Print off your institutional policy. Must be in the catalog.*
- **Current Roster**
  - *ALL students, not just VA.*
- **Tuition Specific Scholarships & Waivers**
  - *Any tuition-specific scholarships or waivers (ie. – Senior Waiver or academic scholarships)*
- **Advertising Material**
  - *All advertising used by the facility in the last year.*
- **Yellow Ribbon**
  - *All financial records relating to the school's use of Yellow Ribbon.*
- **Annual Reporting Fees (ARF)**
  - *Copy of documentation of how your institution utilizes ARF.*
- **Current Unpaid Balance List**
  - *Non-accredited Only. Limited to the survey period and no longer than three years.*
- **Contractual Agreements**
  - *Courses provided by another institution under contract with the school offering the program.*
- **Student Interview Notification**
  - *Copy of email sent to students notifying them of the survey.*

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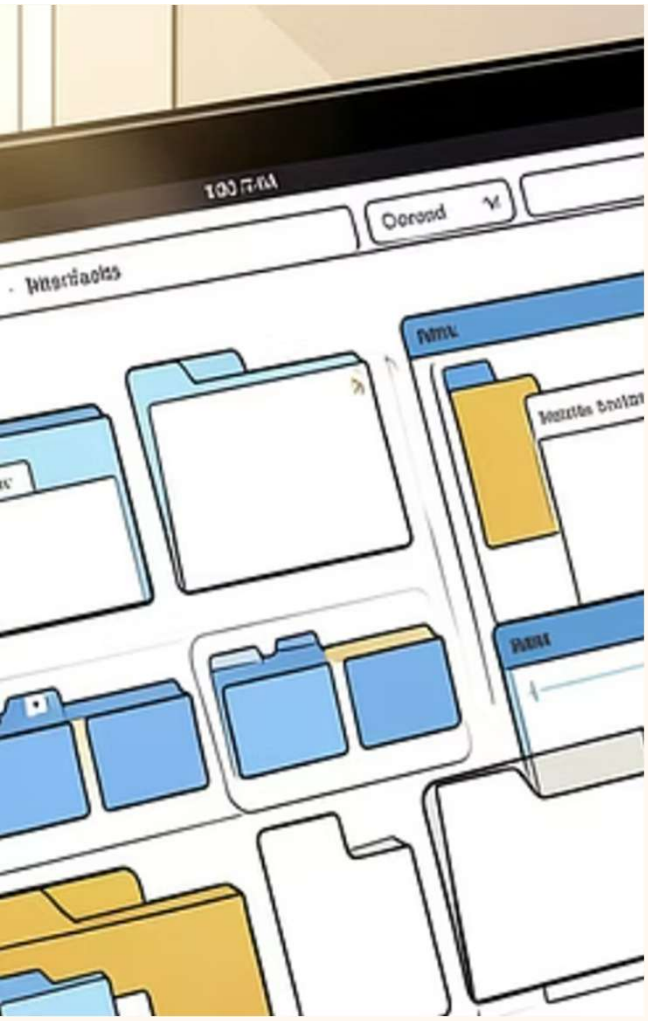
Gathering Student Documents:

- **Unofficial Transcript**
  - *Copy of the student's current transcript.*
- **Financial Ledger**
  - *Any charges & payments. Charges and payments must be clear.*
- **Program Requirements**
  - *Student's degree plan. Degree Works or catalog.*
- **Enrollment Agreement**
  - *Only if applicable.*
- **Admissions Application**
  - *If the application is digital, see if you can get a blank copy.*
- **Transfer Credit Evaluation**
  - *Document showing evaluated credit.*
- **Class Schedule**
  - *Detailed registration by term.*
- **Attendance Records**
  - *Only if your institution has a policy.*
- **Unsatisfactory Progress Documents**
  - *Records of actions taken for academic progress.*
- **College Financing Plan**
  - *Shopping Sheet.*
- **Related Student Documents**
  - *Drop/withdrawal forms, Mitigating Circumstances, Transient Docs*
- **Financial Aid Offer Letter**
  - *Printed or digital*
- **Non-Veteran Student(s) File**
  - *Unofficial Transcript & Ledger*



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Required School Information

- **Facility Information**
  - *Name, facility code & tax information.*
- **Military-Connected Student Count**
  - *Number of students using each federal benefit.*
- **Annual Reporting Fee Explanation**
  - *Provide detailed ARF using records.*
  - *Adhere to Public Law 111-377, Section 204*
- **Enrollment Information**
  - *Priority Enrollment*
  - *SCO Enrollment*

- **Internal Procedure Information**
  - *File maintenance*
  - *Report management*
  - *Payment approvals*
  - *Contract programs*
  - *Independent Study*
  - *VA-funded tutoring*
  - *Power of Attorney*
  - *Yellow Ribbon*

- **Student Information**
  - *A list of students selected for the survey. The number of students will vary per institution.*
- **Public Law 116-315 Section 1018**
  - *"Shopping Sheet" and related questionnaire regarding recruitment, accreditation, and other "truth in advertising" related issues.*

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Annual Reporting Fee Guidelines

(1)Except as provided in paragraph (2) of this subsection, the veteran or eligible person and the educational institution offering a course in which such veteran or eligible person is enrolled under chapter 31, 32, 33, 34, 35, or 36 of this title shall, without delay, report to the Secretary, in the form prescribed by the Secretary, such enrollment and any interruption or termination of the education of each such veteran or eligible person. The date of such interruption or termination will be the last date of pursuit, or, in the case of correspondence training, the last date a lesson was serviced by a school.

(4)Any reporting fee paid to an educational institution or sponsor of a program of apprenticeship after the date of the enactment of the Post-9/11 Veterans Educational Assistance Improvements Act of 2011 (Public Law 111–377)—

(A)shall be utilized by such institution or sponsor solely for the making of certifications required under this chapter **or** chapter 31, 34, or 35 of this title **or** for otherwise supporting programs for veterans; and

(B)with respect to an institution that has 100 or more enrollees described in paragraph (2) may not be used for or merged with amounts available for the general fund of the educational institution or sponsor of a program of apprenticeship.

Public Law 111-377 (Section 204) clarified that effective October 1, 2011, "any reporting fee paid to an educational institution or joint apprenticeship training committee after the date of the enactment of the Post-9/11 Veterans Educational Assistance Improvements Act of 2011, shall be utilized by such institution or committee solely for the making of certifications required under this chapter **or** chapter 31, 34, or 35 of this title **or** for otherwise supporting programs for **Veterans**".

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Uploading Documents to VA Portal

The VA provides a secure Education File Upload Portal for SCOs. Use the portal to submit documents efficiently and consistently by following the steps below. The VA will provide the link and a secure access code.

Step-by-Step Upload Instructions

1. Access the portal using the provided URL and access key.
2. Enter all required contact details.
3. Select the correct document type from the dropdown menu.
4. Review the naming convention required for the file type before uploading.
5. Attach the documents and confirm that the correct file is selected.
6. Submit the upload. Wait for the confirmation message or receipt number.
7. Save any confirmation details for your records.

Naming Examples

Follow the naming format exactly as provided by the surveyor. Common examples include:

- FY24 - 12345 ARF Reports
- FY24 - 12345 Student Upload
- FY24 - 12345 Chapter 31 Files
- FY24 - 12345 Chapter 33 Files
- FY24 - 12345 Compliance Documents

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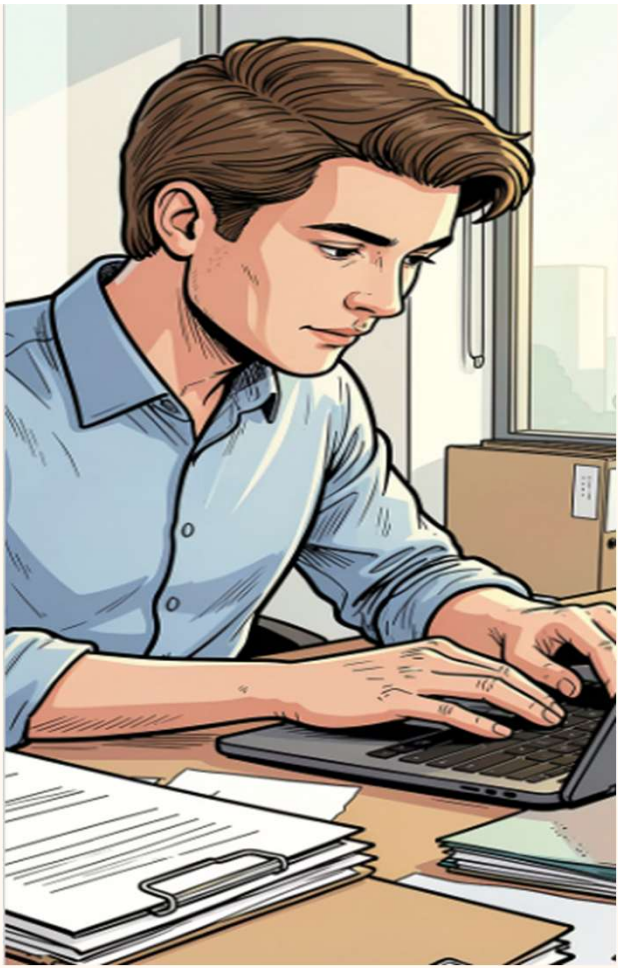
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Uploading Documents to VA Portal

Troubleshooting Tips & Tricks

- If the portal will not accept the file, check the format and file size requirements.
- If the upload fails, rename the file to remove extra characters, symbols, or spaces.
- If the wrong document type was selected, cancel and upload again using the correct category.
- If you do not receive confirmation, refresh the page and verify whether the file was submitted successfully.
- If the portal appears unavailable, try again later or contact the appropriate support person.

⚠ Failure to follow naming conventions can lead to delays and issues.



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Document Organization Best Practices

Efficient document management is crucial for a smooth survey process. Implement these best practices to ensure readiness and compliance.

Centralize & Digitize

Consolidate all relevant documents into a single, accessible electronic system.

Consistent Naming

Adopt a clear, standardized naming convention for all files and folders.

Secure Access

Implement strict access controls to protect sensitive student and school data.

Regular Backups

Automate frequent data backups to prevent loss and ensure data integrity.

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Entrance Interview & Exit Briefing

Identify and prepare private, quiet spaces for potential students and staff interviews, and notify relevant personnel of their availability.

Inform all relevant departments (e.g., Admissions, Registrar, Business Office) about the upcoming survey and their potential role.

The DVA may conduct the survey virtually. St. George is mostly in person.

Entrance Interview

Held at the beginning of the day. Informal discussion with SCOs and administrators on the purpose, scope, and methodology of the survey.

Exit Briefing

Conducted at the end of the survey. Informal review of findings with SCOs and administrators. Opportunity to correct minor issues or clarify discrepancies.

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Common Audit Findings



Inaccurate Reporting

Discrepancies in certified enrollment, tuition, or fees. Implement rigorous internal reviews and cross-reference data regularly.



Missing Documentation

Incomplete student files or absent approval letters. Maintain comprehensive, organized digital and physical record-keeping systems.



Policy Non-Compliance

Failure to adhere to VA regulations or SAA guidelines. Conduct regular staff training and ensure all personnel are updated on policy changes.

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Post-Audit Follow-Up & Continuous Improvement

Post-Audit Follow-Up

- **Address Findings:**
  - *Carefully review all survey findings and official reports.*
- **Corrective Action Plan (CAP):**
  - *Develop a detailed plan with clear timelines and assigned responsibilities.*
- **Implementation:**
  - *Apply necessary changes to policies, procedures, and staff training protocols.*
- **Reporting:**
  - *Submit the CAP and evidence of completion to the VA/SAA as required.*

Continuous Improvement

- **Regular Reviews:**
  - *Periodically assess internal processes and compliance readiness proactively.*
- **Ongoing Training:**
  - *Ensure personnel are consistently up-to-date on regulations and best practices.*
- **Proactive Measures:**
  - *Implement internal controls to prevent future compliance issues.*
- **Stay Updated:**
  - *Monitor changes in VA regulations and state-specific guidelines.*

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Key Takeaways for Compliance Success

- Check for discrepancies such as missing forms, mismatched dates, incomplete certifications, and inconsistent attendance or enrollment data.
- Build a habit of comparing source documents against VA regulations/laws before submitting documents.
- Communicate early with leadership and related staff when a possible issue could affect multiple students.
- Don't be afraid to question findings when documentation supports a different conclusion or when clarification is needed.
- If something looks off, pause and verify/correct it rather than assuming it will be caught later. Fix errors before sending up your paperwork.
- Document everything clearly so others can understand what was reviewed, what was corrected, and why.
- Keep a running list of lessons learned after each review so the same mistakes are less likely to happen again.
- Small process improvements now can prevent bigger findings in the next survey or monitoring visit.

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YOU'VE GOT THIS!

Believe in yourself and keep pushing forward. You have everything it takes to succeed. Stay confident, stay motivated, and go make it happen!

Questions? Comments?

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