

A stylized graphic of the American flag, featuring a blue field with white stars and red stripes, positioned in the upper left corner of the slide.

What to Expect When You are Expecting..... an Audit... *AKA Compliance Survey*

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**AVAA Conference 2025
Orange Beach, AL
October 19 – 23, 2025**

AGENDA

- Types
- Official Notice
- Gathering Info
- Uploading
- Entrance Interview/Exit Briefing
- Final
- Random Thoughts
- Q & A

The slide features a stylized American flag graphic in the top-left and bottom-right corners, with red and white stripes and white stars on a blue background. The word "TYPES" is written in a large, bold, blue sans-serif font in the upper right quadrant of the slide.

TYPES

- **Federal**

- VA
- St. Georges

- **State**

- State Approving Agency (SAA)
- State Funded
 - Alabama National Guard Education Assistance Program (ANGEAP)
 - Alabama GI Dependent Scholarship (ALGI)

The slide features a decorative graphic of the American flag in the top-left and bottom-right corners. The top-left corner shows a blue field with white stars and red and white stripes. The bottom-right corner shows a red field with white stars and red and white stripes. The main content area is white.

Official Notice

- An official ‘Notification Letter’ will be sent by email to the primary school certifying official for each facility code that is part of the compliance survey/audit
- The notice will tell you the date and time, purpose, what to expect, what to provide, student interview information, applicable laws to view records, and the 10-day notice information

Sample Federal Official Notice



DEPARTMENT OF VETERANS AFFAIRS
Veterans Benefits Administration
Education Service
Washington, D.C. 20420

June 13, 2025

Facility Code: FACILITY CODE

PRIMARY SCO NAME
PRIMARY SCO TITLE
INSTITUTION AND CAMPUS
INSTITUTION CAMPUS ADDRESS

Dear PRIMARY SCO

INSTITUTION AND CAMPUS 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 06/26/2025 at 8:00 AM.

WHAT IS THE PURPOSE OF A COMPLIANCE SURVEY

The VA conducts compliance surveys to ensure that approved programs adhere to all 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.

Please inform the facility President/Director of upcoming compliance survey visit. They may join at any time if they wish.

WHAT TO PROVIDE

A detailed checklist is enclosed to assist in gathering the documents required for the visit. Please review the checklist carefully. Additional documents are enclosed in the packet that will need to be completed and returned in preparation for the scheduled site visit.

These documents must be prepared and available prior to the commencement of the site visit. For the safety of the beneficiary's Personally Identifiable Information, you are encouraged to upload the documents electronically utilizing the instructions provided. Please ensure that all documents are clearly labeled and arranged per the instructions in the enclosed document labeled "How To - Education File Upload Portal."

Failure to provide the required documentation may result in discrepant findings.

***During the compliance survey, the surveyor will need a private workspace to review records and conduct any essential student interviews. ***

If there has been changes or other information which needs to be provided to VA, please access the current form at [Find A VA Form | Veterans Affairs](#) and submit to VA using the Education File Upload Portal. Information could include but not limited to the following:

- Designation of Certifying Official, VA form 22-8794
- Statement of Assurance of Compliance with 85 Percent Enrollment Ratios, VA form 22-10215 and 22-10215a
- 35% Exemption Request from 85/15 Reporting Requirement, VA form 22-10216

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 Monday, June 26, 2025 between 10:00AM-11:00AM 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.

AUTHORITY TO VIEW RECORDS

VA has the authority to request and review VA beneficiary and non-VA beneficiary records. Reference is found in 38 United States Code (U.S.C.) § [3690](#) and 38 Code of Federal Regulations (C.F.R.) § [21.4209](#).

Under these authorities, the VA has the right to examine all records the Compliance Survey Specialist deems necessary to confirm that the facility is compliant with all

applicable laws and regulations. Providing records to an authorized VA official does not violate the Family Educational Rights and Privacy Act (FERPA).

10 DAY NOTICE

On January 5, 2023, Congress passed the Veterans Auto and Education Improvement Act of 2022. This Act amended regulations which govern the notification period the Department of Veterans Affairs can allow regarding an upcoming compliance survey. Previously, the notification allowance was approximately 30 days. Due to these changes, VA shall not provide more than 10 days' notice.

IF ASSISTANCE IS NEEDED

If there are any questions regarding this letter or during the compliance survey process, please contact Jessica Pratt via telephone at 334-590-8857 or via email at jessica.pratt@va.gov.

Sincerely,

NAME OF SURVEYOR
Education Compliance Survey Specialist

Enclosures: Compliance Survey Packet including Student Selection
How-to Guide: Education File Upload Portal

Sample SAA Official Notice

CACC Compliance Survey

From J
Date Mon 11/22/2021 9:41 AM
To E

3 attachments (323 KB)

CS Review Notice CACC AC.pdf; CS Review Notice CACC Cburg.pdf; CS School Procedures Questions - Revised 2020.docx

At the behest of the VA, the State of Alabama Approving Agency is tasked to complete a compliance survey at College. A survey will be done at both campuses, A and C. This survey will be conducted at the A campus.

Please see the attached letter referencing the selected VA files and all paperwork required to be available. You will need to supply the 85/15 calculation form for undergraduate, graduate, and certificate programs, that was recently submitted to the Alabama ELR. You must also complete the attached SCO questionnaire for each campus.

Additional documents may be requested as needed.

Please let me know if you have any questions or concerns.

Many thanks for your cooperation in providing the required documents in a timely manner, and for all you do for our veterans.

Thanks,

J
Alabama State Approving Agency
135 South Union Street
P.O. Box 302130
Montgomery, AL 36130-2130
334-293-4708

ALABAMA STATE APPROVING AGENCY

P.O. Box 302130 | MONTGOMERY, AL 36130-2130 | 334.293.4500 | WWW.ACCS.EDU



November 22, 2021

SCO NAME
College - Campus
Address

Dear X,

This letter is to confirm that I will conduct a routine VA compliance survey at your school. The State Approving Agency is required to periodically survey the records of those receiving veterans' training benefits under Chapters, 30, 32, 33, and 35, Title 38, US Code and Chapters 1606 and 1607, title 10 US Code. The purpose of this visit is to determine compliance with Department of Veterans Affairs (DVA) reporting requirements.

The following documents must be available for review for each file listed. In addition, an electronic copy of the documents must be made available for the reviewer to retain.

1. Application for Admission
2. Evaluation of Transfer Credits and Copies of all Prior Transcripts (including military transcripts)
3. Program Curriculum/Degree Plan
4. Unofficial Transcript
5. Individual course schedules for each semester/term
6. Schedule of Tuition and Fees for the Students' degree plan
7. Tuition/Fee Payment Ledger for each term (include specific documentation of school charges and payment sources of each payment, and date of payment)
8. Registration, drop, and withdrawal slips
9. Yellow Ribbon Agreement and Roster (if applicable)
10. Forms 22-1999 and 1999b for each term

Additional documents may be required later, as needed.

STUDENT

1. Ti
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10. Cha

For the institution, please provide the following information.

Page 1 of 2

ALABAMA STATE APPROVING AGENCY

P.O. Box 302130 | MONTGOMERY, AL 36130-2130 | 334.293.4500 | WWW.ACCS.EDU



1. Complete and sign the attached school questionnaire. Be sure to include the total number of current students enrolled at the facility and the number of current VA supported students enrolled at the facility, broken down by Chapters 30, 31, 33, 35, 1606 & 1607.
2. All of the same information above for a non-VA student for review.

Student Notification

It is required that you notify students receiving VA education benefits that a survey is being conducted. The manner in which you accomplish this may be through direct student communication (email or letter) or by displaying notices in the common areas around your campus.

Thank you for your cooperation and time. Let me know if you have any questions.

Sincerely,

J
SAA Director
Alabama State Approving Agency

Gathering Info

- Student Files
 - Checklist
 - Transcripts
 - JST
 - Transfer credit
 - Unofficial school
 - Request for Certification Form
 - College Financing Plan (CFP)
 - Schedules
 - Bills/Ledgers
 - Degree Audits/Plans
 - Attendance Records
 - Academic Progress

Student files contain the following in chronological order:

Left Side:

- College Financing Plan
- Student Ledger with tuition and fees charges
- Student Semester Schedule
- TSI scores (if applicable)
- Course substitution forms
- Request for Certification forms
- Educational Agreement
- Degree Plans/Degree Audits
- Transcripts (JST/CCAF, other colleges attended)
- Any other school related documentation

Right Side:

- Any other correspondence from VA
- VA Form 22-1995 or 22-5495 Change of Program/Place (if applicable)
- VA Form 22-1999-6 (Enrollment Manager Certification)
- Drop/add forms (directly behind the EM adjustment/termination)
- VA Certificate of Eligibility
- DD 214 Member Copy 4/2

A graphic in the top-left corner of the slide, featuring a blue field with white stars and a red field, rendered in a stylized, brush-stroke-like manner.

Gathering Info

- 85/15 and Waiver
- Brochures & Advertisements
 - Don't forget the trademark!
- Non-VA Student
- Catalog
 - Academic Calendars, policies, etc
- Current Roster
- Reporting Fee Expenditures & Location of Funds



Compliance Survey Packet

The checklist has been provided as a tool when gathering the documentation, required to complete the compliance survey. The Required School Documentation form, School Procedures Questionnaire, and Public Law 116-315 Section 1018 questionnaire will all be documentation we need to be filled out, signed and returned to the Compliance Survey Specialist to complete the review.

Record Checklist

Each type of record must contain sufficient detail in order to determine whether the facility is meeting the compliance requirements of GI Bill® benefit programs. Please see the descriptions below for additional information on student documentation and school documentation.

School Documents

During the compliance survey access to all documentation is required. In addition, physical or unalterable electronic copies of documents identified should be provided to your surveyor and will be retained by VA in your facility's Compliance Survey record.

<input type="checkbox"/>	<p>Tuition and Fees Schedule A copy or unalterable PDF of your facility's tuition and fees schedule (extending back three academic years.)</p> <ul style="list-style-type: none"> <input type="checkbox"/>Description of mandatory fees charged by school. <input type="checkbox"/>List of course specific fees <input type="checkbox"/>File name example "FY24-12345678-Tuition Schedule 20##-20##"
<input type="checkbox"/>	<p>Academic Year Calendar A copy or unalterable PDF of your facility's academic calendars (extending back three academic years.) These calendars should include all summer, winter, and mini/module term dates, as applicable.</p> <ul style="list-style-type: none"> <input type="checkbox"/> File name example "FY24-12345678-Academic Calendar 20##-20##"
<input type="checkbox"/>	<p>Title 38 USC 3679(e) Compliance Unalterable PDF of your institutional policy in place that will allow an individual to attend or participate in a program of education if the Chapter 31 or Chapter 33 Beneficiary provides the school with a "Certificate of Eligibility (COE)."</p> <ul style="list-style-type: none"> <input type="checkbox"/> File name example "FY24-12345678-3679e compliance"
<input type="checkbox"/>	<p>Current Roster A roster of all current students enrolled in each approved program and emphasis.</p> <ul style="list-style-type: none"> <input type="checkbox"/> File name example "FY24-12345678-Student Roster by Program Name"
<input type="checkbox"/>	<p>List of Tuition Specific Scholarships or Waivers A listing of tuition specific scholarships or waivers commonly used by your facility. Identify awards that are specifically designated to be applied toward tuition/fees only, as a tuition discount, etc.</p> <ul style="list-style-type: none"> <input type="checkbox"/> File name example "FY24-12345678-Tuition Specific Scholarships or Waivers"
<input type="checkbox"/>	<p>Copies of Advertising Material (past 12 months) A copy of all advertising used by your facility during the last 12 months: For Example: A copy of an ad in a newspaper, magazine, or social media platform; or a transcript of a television, radio, or internet ad.</p> <ul style="list-style-type: none"> <input type="checkbox"/> File name example "FY24-12345678-Advertisement"
<input type="checkbox"/>	<p>School Yellow Ribbon Policy (if applicable) All financial records relating to the school's scholarship or grant for their Yellow Ribbon portion of tuition and fees, how the amounts reported/paid were calculated, how and when students become eligible or not, the exact source for the funding of the scholarship or grant, as well as records showing that the VA's Yellow Ribbon payment was applied to the student's account.</p> <ul style="list-style-type: none"> <input type="checkbox"/> File name example "FY24-12345678-YRP policy"
<input type="checkbox"/>	<p>Annual Reporting Fees (ARF) Documentation A copy of documentation to support how your school utilizes its Annual Reporting Fees (ARF)</p> <ul style="list-style-type: none"> <input type="checkbox"/> File name example "FY24-12345678-ARF Reports"





<input type="checkbox"/>	Current unpaid student balance list and documentation showing your institution's policy on collections of unpaid balances of tuition and fees only (Nonaccredited Only). Limited to the period of the survey and not to exceed three years. <input type="checkbox"/> File name example "FY24-12345678-Unpaid balances report"
<input type="checkbox"/>	Contractual Agreements (if applicable) A contracted course is any part of a program of education offered by any educational institution if the educational institution or entity providing the course is under contract with the educational facility offering the program. <input type="checkbox"/> File name example "FY24-12345678-Contractual Agreement with Facility Name"
<input type="checkbox"/>	Student Interview Notification Email (if applicable) A copy of the email you sent to your school notifying your VA students that VA is conducting a compliance survey and will be onsite, as directed by the notification letter. <input type="checkbox"/> File name example "FY24-12345678-student email notification"





Student Documents

During the compliance survey access to all documentation is required. In addition, physical or unalterable electronic copies of documents must be provided to your surveyor to be formally retained by VA in your facility's Compliance Survey record.

<input type="checkbox"/>	<p>Unofficial Transcript A copy of the student's current transcript at your facility.</p> <ul style="list-style-type: none"> <input type="checkbox"/> This document must include courses taken, grades, term-by-term GPA, and cumulative GPA. <input type="checkbox"/> This document must be complete and current through the last term completed by student.
<input type="checkbox"/>	<p>Financial Ledgers (showing charges and credits) For all VA beneficiaries: It must be expressly noted in the student's file if the student's course or course(s) are being paid for in whole or in part under the Government Employees' Training Act (GETA). For Chapter 33 beneficiaries: It is imperative debits and credits on the student's ledger are identifiable by name. If a coding system is used, provide an explanation of the coding system and what various entries represent. The ledgers must include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> All charges to the student's account, all payments/credits to the student's account from VA and all other sources including institutional, private, federal and other financial aid program (scholarship payment requirements). <input type="checkbox"/> Must be detailed enough to determine the source of all charges and credits/payments, including how charges were determined and payments were credited. <input type="checkbox"/> The term in which any charges/payments/credits occur should be clearly identified and linked to the appropriate dollar amount. <input type="checkbox"/> VA payments and refunds should be clearly labeled as such. This includes Yellow Ribbon payments (both VA and school payments). <input type="checkbox"/> Do not lump other campus payments (with a separate facility code) within the payments for your campus.
<input type="checkbox"/>	<p>Degree/Program Requirements A copy of the student's degree plan checklist (program outline/curriculum) or degree progress audit report.</p> <ul style="list-style-type: none"> <input type="checkbox"/> This document must reflect courses required for the student's program of study. If the student has pursued more than one program at your school (to include minors), include program plans for each program.
<input type="checkbox"/>	<p>Enrollment Agreement (if applicable) Enrollment agreement(s)/contract between school/student.</p>
<input type="checkbox"/>	<p>Application for Admission to School Completed application for admission to school.</p>
<input type="checkbox"/>	<p>Transfer Credit Evaluation A copy of transfer evaluation data sheet showing student's prior school(s)/military credits that were evaluated.</p> <ul style="list-style-type: none"> <input type="checkbox"/> This sheet should clearly demonstrate what, if any, credits were awarded to the student. <input type="checkbox"/> If the student has no applicable prior or transfer credits, a signed statement must be provided which notates that your facility reviewed for prior/transfer credit, and none was found applicable.
<input type="checkbox"/>	<p>Class Schedule Class Schedules must be provided for each term/semester/quarter.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Include begin and end dates of course(s), days per week course(s) are scheduled to meet, hours per day, and location each class is scheduled to meet. <input type="checkbox"/> Be sufficient for VA to verify whether any class meets the regulatory requirements to be considered resident or distance. <input type="checkbox"/> Be coded to differentiate between resident and online and campuses (and should also be made clear in the catalog, handbooks, etc.).
<input type="checkbox"/>	<p>Attendance Records (if applicable) A copy of detailed attendance records in accordance with published attendance standards.</p>



<input type="checkbox"/>	Unsatisfactory Progress Documentation (if applicable) Records regarding actions taken related to unsatisfactory academic progress.
<input type="checkbox"/>	Remedial Test Scores (if applicable) A copy of detailed test scores or evaluations used to determine the student's need for remedial courses.
<input type="checkbox"/>	College Financing Plan A copy of personalized College Financing Plan (Shopping Sheet) for each student.
<input type="checkbox"/>	Related Student Documents (e.g., Drop/Withdrawal Slips, Mitigating Circumstances Documentation, Parent Institution Letter). <ul style="list-style-type: none"> <input type="checkbox"/> Drop/withdrawal slips and other documentation indicating last dates of attendance. <input type="checkbox"/> Appropriate documentation supporting any certified mitigating circumstances, such as medical statements, etc. <input type="checkbox"/> Documentation at parent institution to grant secondary institution subject. The parent institution should also obtain grade reports from the secondary institution. The secondary institution should maintain the parent school letter.
<input type="checkbox"/>	Financial Aid Offer Letter A copy of all Financial Aid and Scholarship offers to the student.
<input type="checkbox"/>	Non-Veteran Record(s) Student record(s) of similarly circumstanced students. Student record(s) will be identified by your reviewer when they arrive. A listing of Non-Veteran students may be requested to assist with the selection of records. <ul style="list-style-type: none"> <input type="checkbox"/> Unofficial Transcript <input type="checkbox"/> Financial Ledger

Required School Information

Name of Facility	
Facility Code	
Facility Tax Identification Number (TIN)	

(Chapter 30) Number of Students Currently Enrolled and Receiving Montgomery GI Bill – Active-Duty Benefits	
(Chapter 31) Number of Students Currently Enrolled and Receiving Vocational Rehabilitation and Employment Benefits	
(Chapter 32) Number of Students Currently Enrolled and Receiving Post-Vietnam Era Veterans Educational Assistance Program Benefits	
(Chapter 33) Number of Students Currently Enrolled and Receiving Post-9/11 GI Bill Benefits	
(Chapter 35) Number of Students Currently Enrolled and Receiving Survivors and Dependents Educational Assistance Benefits	
(Chapter 1606) Number of Students Currently Enrolled and Receiving Montgomery GI Bill – Selected Reserve Benefits	
Total Number of Students Currently Enrolled That Are Not Receiving VA Benefits	

Provide a detailed description of how your school utilizes its Annual Reporting Fees (ARF)	
---------------------------------------------------------------------------------------------------	--

If your school received an ARF payment for 100 or more VA beneficiaries, are the ARF released to your school merged with a general fund?	<input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> My school received an ARF payment for less than 100 VA Beneficiaries
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Does your school offer Priority Enrollment to Veterans, Servicemembers, and Reservists?	<input type="checkbox"/> No <input type="checkbox"/> Yes
------------------------------------------------------------------------------------------------	-------------------------------------------------------------

Has any School Certifying Official received VA Education Benefits while attending your facility?	<input type="checkbox"/> No <input type="checkbox"/> Yes
---------------------------------------------------------------------------------------------------------	-------------------------------------------------------------

Name of Individual Completing This Form	
Title of Individual Completing This Form	
Signature of Individual Completing This Form	

School Procedures Questionnaire

How are VA student files maintained?	
How is the School Certifying Official (SCO) notified of changes in enrollment, to include suspension or graduation?	
Is your facility approved for GI Bill Advanced Payments, what process does the facility have in place for safeguarding and distributing the payment?	
Are any programs or courses offered at your facility provided by another school or entity under contract?	
Does your facility offer independent study courses, cooperative courses, or correspondence courses?	
Do any students receive VA tutorial assistance (VA Form 22-1990T)? If so, how are tutors selected?	
Does your facility exercise power of attorney authority to negotiate educational assistance checks on behalf of any VA students?	
If your school participates in the VA Chapter 33 Yellow Ribbon Program, please describe how you determine the Yellow Ribbon amount you report on a student's VA Chapter 33 certification, and how you maintain a student participant roster?	
Name of Individual Completing This Form	
Title of Individual Completing This Form	
Signature of Individual Completing This Form	
Name of Facility	
Facility Code	

Compliance Survey Student List

Student Name	Last 4 of SSN	VA Benefit
Anderson	8268	35
Bryant	1254	33
Carthen	7447	35
Cobb	2122	33
Hill	1808	35
Hussey	4555	1606
Pruett	1001	30
Smith	5436	33
Thomas	5069	35
Webb	3697	1606

Public Law 116-315 Section 1018: Requirements for educational institutions participating in the educational assistance programs of the Department of Veterans Affairs

Section 1018 is effective June 15, 2021, applies to Institutions of Higher Learning and Non-College Degree institutions beginning August 1, 2021, [Financial Aid Shopping Sheet \(ed.gov\)](#). The provision mandates adherence to the requirements of the Principles of Excellence, currently in [Presidential Executive Order #13607](#), among other requisites to maintain approval for GI Bill® participation and obligates schools that receive federal funding through programs such as the GI Bill® to follow certain guidelines. You must provide responses to the questions below. These questions may be outside of the scope of your regular duties as the designated School Certifying Official. Please have the appropriate office within your school assist you with gathering the needed information.

1	Does your school provide a "College Financing Plan" to Veteran students and their dependents?	**If yes, provide a copy of the College Financing Plan your facility provided to each student in your survey.
2	Does your school have policies to alert and inform Veteran students and their dependents to the availability of Federal financial aid prior to arranging other financing?	
3	Does your school use recruiters to increase enrollment of Veterans and their dependents? If so, please describe the standard methods used, to include any payments or incentive compensations.	
4	Has your school obtained the approval of its accrediting agency for new course offerings prior to enrolling students in such courses or programs where appropriate?	
5	Are Servicemembers and Reservists readmitted to programs if they are temporarily unavailable to attend class or must suspend their studies due to service requirements and accommodations made for short absences resulting from service obligations?	
6	Does your school fully disclose conditions or additional requirements, including training, experience, or examinations, required to obtain the license, certification, or approval for which the course of education is designed to provide preparation?	
7	Does your school provide detailed educational plans to Veteran students and their dependents outlining graduation requirements?	
8	Does your school have a point of contact for academic and financial advising to assist Servicemember and Veteran students and their families?	**If yes, provide name, title, and contact information for the point of contact.

Name of Individual Completing This Form	
Title of Individual Completing This Form	
Signature of Individual Completing This Form	
Name of Facility and Facility Code	

AUTHORITY TO VIEW RECORDS

38 USC § 3690 states:

"(c) Examination of Records. Notwithstanding any other provision of law, the records and accounts of educational institutions pertaining to eligible Veterans or eligible persons who received educational assistance under this chapter or chapter 31, 32, 34, or 35 of this title, as well as the records of other students which the Secretary determines necessary to ascertain institutional compliance with the requirements of such chapters, shall be available for examination by duly authorized representatives of the Government."

38 CFR § 21.4209 states:

"(a) Availability of records. Notwithstanding any other provision of law, an educational institution, including for purposes of this section an organization or entity offering a licensing or certification test, must make the following records and accounts available to authorized Government representatives:

(1) Records and accounts pertaining to Veterans or eligible persons who received educational assistance under 10 U.S.C. § chapter 1606 or 38 U.S.C. § chapter 30, 32, 33, 35, or 36;

(2) Other students' records necessary for the Department of Veterans Affairs to ascertain institutional compliance with the requirements of these chapters; and

(3) The records of other individuals who took a licensing or certification test that VA believes are necessary to ascertain whether the Veterans and eligible persons taking such test were reimbursed the correct amount.

(b) Type of records. Each educational institution must upon request of duly authorized representatives of the Government make available for examination all appropriate records and accounts, including but not limited to:

(1) Records and accounts which are evidence of tuition and fees charged to and received from or on behalf of all Veterans, reservists, and eligible persons and from other students similarly circumstanced;

(2) Records of previous education or training of Veterans, reservists, and eligible persons at the time of admission as students and records of advance credit, if any, granted by the educational institution at the time of admission;

(3) Records of the Veteran's, reservist's, or eligible person's grades and progress;

(4) Records of all advertising, sales or enrollment materials as required by 21.4252(h) and section 3696(b), title 38 U.S.C.;

(5) Records and computations showing compliance with the requirements of 21.4201 regarding the 85-15 percent ratio of students for each course; and

(6) Records necessary to demonstrate compliance with the requirements of 21.4252(e) pertaining to the time necessary to complete a correspondence course.

(7) Records necessary to demonstrate compliance with the requirements of 21.4268.

(c) Noncollege degree, apprentice, and other on-the-job. The educational institution having Veterans, servicemembers, reservists, and/or eligible persons enrolled in a course that does not lead to a standard college degree must make available, in addition to the records and accounts required in paragraph (b) of this section, the records of leave, absences, class cuts, makeup work, and tardiness. Each training establishment that has enrolled Veterans under 38 U.S.C. § chapter 30, 32, or 33, reservists under 10 U.S.C. § chapter 1606, or eligible persons under 38 U.S.C. § chapter 35 must also make available payroll records.

(d) Nonaccredited courses. The educational institution having Veterans or eligible persons enrolled in nonaccredited courses must make available, in addition to the records and accounts required in paragraphs (b) and (c) of this section the following:

(1) Records of interruptions for unsatisfactory conduct or attendance.

(2) Records of refunds of tuition, fees and other charges made to a Veteran or eligible person who fails to enter the course or withdraws or is discontinued prior to completion of the course.

(e) Nonavailability. Failure to make such records available as provided in this section will be grounds for discontinuing the payment of educational assistance allowance or special training allowance."

Please note that schools and training establishments must make records of progress and training, tuition and fees charges, and other records available upon request by a duly authorized representative of the Government. The records of both VA students and non-VA students will be reviewed when comparing tuition and fees charges. It has been determined that school records relating to VA benefits fall into the "financial aid" category and are therefore exempt from the provisions of the Buckley amendment. Therefore, the VA shall have access to the records of VA beneficiaries as well as non-VA students without the written consent of the student in order to monitor the school's compliance with the law. [38 United State Code § 3690\(c\)](#).

UPLOADING

- Email Attachment with Instructions to Upload Documents

External User Process (SCO):

1. Provide the URL and Key to the Authorized File Submitter, the School Certifying Official (SCO), along with the request for documents. Cut and paste the following URL into the browser window:

<https://www.my.va.gov/EducationFileUploads>

2. Below is the landing page



Please complete all the fields below.

*First and Last Name

*Email address

red@sample.com

Enter the information provided by the authorized government representative specific to the compliance activity.

*Fiscal Year (from dropdown)

- None -

*Facility Code

*Purchase Identifier (if)

Click "Next" to proceed to the Upload Files Landing page. After dragging and dropping files, click "Submit Files". Email confirmation will serve as verification the upload is complete.

Next

UPLOADING

- Pay attention to the Naming Convention
- Ask your Auditor if they want all students in one file or individually

- Naming Convention for SCOs – please name files accordingly **before** uploading with the formatting below:

FYXX - (facility code) ARF Reports
FYXX - (facility code) Notice of On-Site Survey
FYXX - (facility code) Student Interviews
FYXX - (facility code) Student Files
FYXX - (facility code) Entrance Briefing
FYXX - (facility code) Advertising
FYXX - (facility code) Trademark Violations
FYXX - (facility code) 85/15 Reports
FYXX - (facility code) Catalog 2022-23
FYXX - (facility code) Catalog 2021-22
FYXX - (facility code) Catalog 2020-21
FYXX - (facility code) Referrals to SAA
FYXX - (facility code) Referrals to RPO
FYXX - (facility code) Narrative Report
FYXX - (facility code) Findings Letter
FYXX - (facility code) Shopping Sheet
FYXX - (facility code) TRBR Executive Summary
FYXX - (facility code) Principles of Excellence
FYXX - (facility code) Accreditation
FYXX - (facility code) RBS Financial Soundness
FYXX - (facility code) RBS Approval-Administrative Review
FYXX - (facility code) RBS Complaints Review
FYXX - (facility code) RBS Job Aids
FYXX - (facility code) RBS Findings Report

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ENTRANCE INTERVIEW

- Determine a location on Campus
 - Be readily available
 - ‘Be Our Guest’
- At the beginning of the day
 - Decide who will be in the entrance
 - SCOs, Supervisors, other School Administrators
 - Informal to let you know what to expect
 - Purpose
 - Scope
 - Methodology
 - Any other information
 - Including if needing anything printed
 - Any questions

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EXIT BRIEFING

- At the end of the survey/audit
 - Decide who will be in the exit interview
 - SCOs, Supervisors, other School Administrators
 - Informal to let you know what was found
 - Typically, the Education Compliance Survey Specialist (ECSS)/Surveyor will give you a chance to correct items
 - May be asked to send follow-up documents after the surveyor leaves

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FINAL

- Received via Email
 - Final Narrative Report
 - Final Finding Letter
 - Multiple parts
 - General Info – includes SAA info
 - List of Students surveyed
 - Entrance Interview discussion and attendees
 - Discrepancies
 - Summary
 - Exit Briefing discussion and attendees
 - All of your school information in the information you submitted
 - Overpayment/Underpayment info
 - Recommendations for the future
 - Compliance Survey Close-Out Notice
- The President will receive a copy



DEPARTMENT OF VETERANS AFFAIRS
Veterans Benefits Administration
Education Service
Washington, D.C. 20420

07/02/2025

Facility Code:

YOUR SCHOOL AND CAMPUS
SCO
SCHOOL ADDRESS

Dear SCO,

A compliance survey was recently conducted at your facility on June 26, 2025. Thank you for the hospitality you extended to the surveyor during their visit. Attached you will find the narrative report of the survey findings, including any discrepancies found during the visit. This attachment will provide more specific information concerning the individual discrepancies.

If you have questions or require assistance with any VA regulations or requirements, please contact VA by email at EDUACL-SOUTH.VBAATG@va.gov.

Sincerely,

YOUR COMPLIANCE SURVEYOR
Education Compliance Survey Specialist
VA Approval, Compliance & Liaison

Enclosure: Narrative Report



**Narrative Report
Compliance Survey**

College - - Campus

AL 36

Facility Code: 1

I. GENERAL

The purpose of a Compliance Survey is to ensure that approved programs are compliant with all applicable provisions of Title 38, United States Code (USC) § 3693 administered by VA.

A routine Compliance Survey was conducted onsite at College- Campus (referred to throughout as the ETI) by Education Compliance Survey Specialist (ECSS). The official notification of the survey was delivered via email to on June 13, 2025.

Date of Last Approval: In preparation for the survey, a review of College- Campus's approval record was conducted to determine the last date of re-approval by the State Approving Agency (SAA) (i.e., full catalog reviewed: policies, instructor quality, accreditation, licensure, business license [if applicable], advertising and catalog statements, etc.). The date of SAA's last full catalog approval August 19, 2024. This date is



A decorative graphic of the American flag, featuring a blue field with white stars in the upper left and red and white stripes, rendered in a painterly, brushstroke style. The graphic is positioned in the top-left and bottom-right corners of the slide.


RANDOM THOUGHTS

- Is there a need to have multiple prints of the same thing?
 - Ex: Catalog and your degree audit system
- Is the invoice printed on the schedule?
- Keep your files in order when you certify
- Print your CFP each semester
- Keep up with your 85/15s & Waivers
- Know what your PR/Marketing staff are doing with VA posts/events

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RANDOM THOUGHTS

- TRADEMARK
- Do you give one semester without all transcripts?
- Do you require a form to request certification each semester?
- They are going to find something...
 - Trademark, Late Certs, Reporting enrollment/graduation/degree changes, Repeat courses
 - Don't be afraid to respectfully request where the guidelines/regulations are for the finding
 - They are human too
- SAA vs VA Surveyor vs ELR interpretations
- How often do you get audited and why?



Q & A