

SUPPORTING STATEMENT - PART A

Department of Defense (DoD) Voluntary Education Partnership Memorandum of Understanding (MOU) Institutional Compliance Program (ICP) – 0704-VEPP

1. Need for the Information Collection

In September 2014, the U.S. Government Accountability Office (GAO) performed an audit (GAO Assessment 14-855: Action is Needed to ensure Evaluations of Postsecondary Schools Are Useful) of the performance of a contracted third-party evaluation centered on institutions participating in a Department of Defense (DoD) Tuition Assistance (TA) program. Upon completion of the audit, the GAO determined that the third-party assessment did not provide the evaluation information needed by the DoD to evaluate these institutions within the TA program. The GAO recommended that the DoD develop a clearly defined evaluation program in order to accurately assess the compliance and provide oversight of the participating institutions. The DoD agreed with these findings and set out to create a structure of compliance and oversight in relation to the Principles of Excellence (PoE) set forth in Executive Order 13607, Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans Spouses, and Other Family Members, as well as the DoD Instruction (DoDI) 1322.25, “Voluntary Education Program”, dated March 15, 2011.

2. Use of Information

Under the direction of the Under Secretary of Defense for Personnel and Readiness (USD P&R) and the Assistant Secretary of Defense for Readiness (OASD(R)), the Department of Defense Voluntary Education (DoD VolEd) program within the Office of the Deputy Assistant Secretary of Defense for Military Personnel Policy (DASD(MPP)) oversees the Tuition Assistance (TA) program that provides education benefits to active duty and reserve Service members. Per DoD policy, in order to participate in the TA program and receive TA funding, educational institutions must sign a Voluntary Education Partnership Memorandum of Understanding (MOU) with the DoD. To be eligible to enter into such MOU, an educational institution must be accredited by an accrediting organization recognized by Education Department (ED), approved for VA funding, and certified to participate in federal student aid programs through the ED under Title IV of Public Law 89-329, also known and referred to in this instruction as the Higher Education Act of 1965. By signing the MOU, institutions agree to a set of behaviors, processes, and policies – all focused on improving program delivery to Service members.

The DoD Voluntary Education Partnership MOU Institutional Compliance Program (ICP) is a full-scale, risk-based compliance program that assesses institutional compliance with these standards, in order to reduce risks associated with non-compliance. Each year, the ICP team considers the entire population of MOU signatories, leveraging over 24,000 pieces of data to narrow the population from over 2,700 to 250, and then conducts an in-depth

assessment on those 250 institutions. The 2,700 individual institutions voluntarily entered into a Memorandum of Understanding (MOU) with Office of Secretary of Defense (OSD) Voluntary Education (VoLED) to allow service members to use Tuition Assistance (TA) at their institution. Institutions with an MOU may be selected for the ICP to ensure compliance. Once selected for the ICP, the institution will provide answers to a self-assessment while the ICP compliance team performs reviews of marketing web pages within an institutions site. The team then provides critical feedback to those institutions to enable them to implement Corrective Action Plans (CAPs) to improve their individual level of compliance with the tenets of their MOUs.

To determine the initial roster of 250 respondents, the ICP team employed a two-step approach. First, the entire roster of 2,700+ higher educational institutions was evaluated using a risk-based model composed of six quantitative data elements, populated with FY24 annual data on factors such as course completion rates and graduation rates. This data is collected by each individual service on Service Members who have completed courses and graduated. Each institution enters into a Memorandum of Understanding (MOU) with Office of Secretary of Defense (OSD) Voluntary Education (VoLED) to allow service members to use Tuition Assistance (TA) at their institution. The six quantitative data elements, which are indicators of potential risk, were used to select a subset of 50 institutions using a systemic, objective methodology. Once this process was completed, an additional 200 institutions were randomly selected from the remaining population to complete the list of 250.

The educational institutions selected for assessment are provided a letter explaining the review process, requirements, and how to submit the completed Self-Assessment and any associated materials via the VoEd Compliance Portal housed in a Salesforce Experience Cloud solution. All completed assessments are submitted directly to the VoEd Compliance Portal for analysis. The information collection tool is also accompanied by a cover letter, which includes the overall purpose, and instructions on how to complete and return (see appendix). Respondents are directed to return their responses, within a deadline of 30 calendar days, to the VoEd Compliance Portal.

The respondents are identified representatives and other cognizant personnel from higher education institutions who have knowledge and insights into the institutions' internal policies regarding their practices intended to promote compliance with the tenets of the Department of Defense Voluntary Education Partnership Memorandum of Understanding (MOU), which the educational institution signed with the Department of Defense (DoD).

The institutions are also asked, if necessary, to submit supplementary "Exhibits" that could be used to support a given answer. For instance, if an institution's policy relating to the aforementioned semester hour credit transfer agreements is contained in an online catalog, the institution can either send a .pdf version of the catalog or a link to where it can be accessed online.

Once a respondent returns their self-assessment information to the Voluntary Education Compliance Portal, its return is logged in a central status system, and a confirmation email (see appendix for sample confirmation email) is sent back to the educational institution, notifying them that their submission has been received, and is being processed. Then, an ICP member will evaluate their responses using a DoD-approved scoring rubric that has been pre-determined by DoD Voluntary Education. The scoring rubric is used to help determine if the educational institution under consideration has demonstrated a relative level of compliance risk that is high enough to warrant further evaluation.

Regardless of whether the institution is evaluated further, each non-compliant finding for a given institution is documented and provided back to the institution, to leverage that feedback to improve the institution's overall level of compliance. Feedback and remediation are one of the key features of any successful internal control program evaluation.

The successful effects of the information collection overall are multifold. First, the selected educational institution will receive direct, customized, specific feedback report on its level of compliance, along with recommended actions to improve overall performance in the compliance area. Next, institutions who demonstrate a relatively high level of risk oversight of non-compliance with the DoD MOU can be identified for further evaluations, where such institutions will receive a higher level of feedback, and the commensurate recommendations for remediation and program improvement. This may or may not include greater scrutiny or compliance actions, depending on the institution and its noncompliant findings. Then, the DoD team, in conjunction with its ICP support, can perform trend analyses and generate overarching findings that can then be related to the rest of the stakeholder community. Given that the annual cycle of the ICP only covers less than 10% of the total population, due to time and resource constraints, this general feedback enables educational institutions who were not part of the annual evaluation cycle to leverage the lessons learned and improve their overall compliance as well. Finally, the information collected in the self-assessments enables the DoD Voluntary Education to promote a culture of compliance across their stakeholder community. In addition, it improves the level of confidence that the overall Tuition Assistance program is operating in a way to increase the opportunities for military members to pursue their academic goals, while still providing the military members with the appropriate protections from harmful behaviors.

3. Use of Information Technology

100% of the responses will be collected electronically. The vendor (Guidehouse) established the VolEd Compliance Portal for the educational institutions to submit their ICP assessment. The Compliance Portal has 2369 users currently with 800 more expected to be added for the 2025 cycle.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

An annual assessment cycle was selected to reduce the potential burden on any one educational institution. Overall, the program will cover approximately 9% of the DoD MOU educational institutions per year. In addition, educational institutions that are selected in a particular year are not to be targeted the next year. If the assessment is conducted less frequently, it could potentially place Service Members in an at-risk education environment in which their educational and professional goals would be at jeopardy. At a minimum, not identifying noncompliance educational institutions early in the process, could lead to additional financial burden on the Service Member.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Monday January 6, 2025. The 60-Day FRN citation is 90 FRN 622.

No comments were received during the 60-day Comment Period.

A 30-Day Federal Register Notice for the collection published on Wednesday, June 18, 2026. The 30-Day FRN citation is 90 FRN 26038.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is provided at the initial point of collection within the Department of Defense Memorandum of Understanding (DoD MOU) Application, as documented within the PIA provided with this package.

A copy of the applicable SORN DoD 0005, Defense Training Records has been provided with this package for OMB's review.

A copy of the PIA, VolEd Customer Relationship Management Compliance Tool, has been provided with this package for OMB's review.

Records are unscheduled until approved by NARA; Proposed retention: Cut off at term of MOU. Destroy 20 years after cutoff.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

1) Collection Instrument(s)

Institutional Compliance Portal

- a) Number of Respondents: 250
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 250
- d) Response Time: 12 hours
- e) Respondent Burden Hours: 3,000 hours

2) Total Submission Burden (Summation or average based on collection)

- a) Total Number of Respondents: 250
- b) Total Number of Annual Responses: 250
- c) Total Respondent Burden Hours: 3,000 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

Institutional Compliance Portal

- a) Number of Total Annual Responses: 250
- b) Response Time: 12 hours
- c) Respondent Hourly Wage: \$35
- d) Labor Burden per Response: \$420
- e) Total Labor Burden: \$ 105,000

2) Overall Labor Burden

- a) Total Number of Annual Responses: 250
- b) Total Labor Burden: \$105,000

The respondent hourly wage was determined using the 2024 Occupational Employment and Wages in Washington-Arlington-Alexandria from the United States Bureau of Labor and Statistics:

https://www.bls.gov/regions/mid-atlantic/news-release/occupationalemploymentandwages_washingtondc.htm

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

Institutional Compliance Portal

- a) Number of Total Annual Responses: 250
- b) Processing Time per Response: 5 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$60
- d) Cost to Process Each Response: \$300
- e) Total Cost to Process Responses: \$75,000

2) Overall Labor Burden to the Federal Government

- f) Total Number of Annual Responses: 250
- g) Total Labor Burden: \$75,000

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$0
- b) Printing: \$0
- c) Postage: \$0
- d) Software Purchases: \$0
- e) Licensing Costs: \$0

- f) Other: \$11,161*
*Administrative Cost

2) Total Operational and Maintenance Cost: \$11,161

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$75,000
- 2) Total Operational and Maintenance Costs: \$11,161
- 3) Total Cost to the Federal Government: \$86,161

15. Reasons for Change in Burden

This is a new collection with a new associated burden.

16. Publication of Results

The results of this information collection are published at the aggregated level for institutions overall, not an individual or even institutional level, on the MOU website (<https://dodmou.com/>). Estimated time for collection and publication date include a collection start month of February and a collection completion date of May. The collection will then be published within one year of collection of results.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.