



Department of Defense
2025 Institutional Compliance
Program: Self-Assessment
Form

Self-Assessment Begins Here:

Category 1: Recruiting, Marketing, & Advertising

Per DoD MOU paragraph 3.j.

Have policies in place compliant with program integrity requirements consistent with the regulations issued by ED [Department of Education] (34 C.F.R 668.71-668.75 and 668.14) related to restrictions on misrepresentation, recruitment, and payment of incentive compensation. This applies to the educational institution itself and its agents including third party lead generators, marketing firms, or companies that own or operate the educational institution. As part of efforts to eliminate unfair, deceptive, and abusive marketing aimed at Service members, educational institutions will:

- (1) Ban inducements, including any gratuity, favor, discount, entertainment, hospitality, loan, transportation, lodging, meals, or other item having a monetary value of more than a *de minimis* [defined as "an insignificant amount"] to any individual or entity, or its agents including third party lead generators or marketing firms other than salaries paid to employees or fees paid to contractors in conformity with all applicable laws for the purpose of securing enrollments of Service members or obtaining access to TA funds. Educational institution sponsored scholarships or grants and tuition reductions available to military students are permissible;
- (2) Refrain from providing any commission, bonus, or other incentive payment based directly or indirectly on securing enrollments or federal financial aid (including TA funds) to any persons or entities engaged in any student recruiting, admission activities, or making decisions regarding the award of student financial assistance;
- (3) Refrain from high-pressure recruitment tactics such as making multiple unsolicited contacts (3 or more), including contacts by phone, email, or in-person, and engaging in same-day recruitment and registration for the purpose of securing Service member enrollments.

1. **Provide the institutional policy that ensures that the institution refrains from providing commission, bonus, or other incentive payment based directly or indirectly on securing enrollments or federal financial aid (including Tuition Assistance funds) to any persons or entities engaged in any student recruiting, admission activities, or making decisions regarding the award of student financial assistance.**

Evidence may include references to employee manuals or handbooks, employee training, defined processes and procedures, or policies. If exhibit is attached, please include the exhibit number, document title, and specific page numbers to reference in the response area below.

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2. **Provide the institutional policy that the institution refrains from high-pressure recruitment tactics such as making multiple unsolicited contacts (3 or more), including contacts by phone, email, or in-person, or engage in same-day recruitment and registration for the purpose of securing Service member enrollments.**

Evidence may include references to employee manuals or handbooks, employee training, defined processes and procedures, or policies, student information guides, help links, URLs, or screen shots. If exhibit is attached, please include the exhibit number, document title, and specific page numbers to reference in the response area below.

Per DoD MOU paragraph 4.d.

(1) Approved Courses. If an eligible Service member decides to use TA, educational institutions will enroll him or her only after the TA is approved by the individual's Service. Service members will be solely responsible for all tuition costs without this prior approval. This requirement does not prohibit an educational institution from pre-registering a Service member in a course in order to secure a slot in the course. If a school enrolls the Service member before the appropriate Service approves Military TA, then the Service member could be responsible for the tuition. All Military TA must be requested and approved prior to the start date of the course. The Military TA is approved on a course-by-course basis and only for the specific course(s) and class dates that a Service member requests. If a military student "self-identifies" their eligibility and the Service has not approved the funding, then the Service member will be solely responsible for all tuition costs, not the Service.

3. **Provide evidence that the institution directs Service members to speak with their Educational Services Officer (ESO) or counselor within their Military Service prior to enrolling the student in the institution.**

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Evidence may include references to employee manuals or handbooks, employee training, defined processes and procedures, or policies, student information guides, Help links, URLs, or screen shots. If exhibit is attached, please include the exhibit number, document title, and specific page numbers to reference in the response area below.

Category 2: Financial Matters

Per DoD MOU paragraph 3.h.

Before offering, recommending, arranging, signing-up, dispersing, or enrolling Service members for private student loans, provide Service members access to an institutional financial aid advisor who will make available appropriate loan counseling, including, but not limited to:

- (1) Providing a clear and complete explanation of available financial aid, including Title IV of the Higher Education Act of 1965, as amended.
- (2) Describing the differences between private and federal student loans to include terms, conditions, repayment and forgiveness options.
- (3) Disclosing the educational institution's student loan Cohort Default Rate (CDR), the percentage of its students who borrow, and how its CDR compares to the national average. If the educational institution's CDR is greater than the national average CDR, it must disclose that information and provide the student with loan repayment data.
- (4) Explaining that students have the ability to refuse all or borrow less than the maximum student loan amount allowed.

4. **Provide evidence showing that the institution designates a point of contact and has management controls in place to ensure that a financial aid advisor and/or loan counselor is trained and qualified prior to offering, recommending, arranging, signing-up, dispersing, or enrolling Service members for federal or private student loans.**

Evidence may include **job descriptions**, position qualifications, references to employee manuals or handbooks, employee training processes and procedures, or policies. If exhibit is attached, please include the exhibit number, document title, and specific page numbers to reference in the response area below.

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- 5. Provide any URLs for websites that Service members are instructed to use to access financial aid information.**

- 6. Provide evidence that the institution discloses its student loan Cohort Default Rate (CDR), the percentage of its students who borrow, and how its CDR compares to the national average.**

This evidence may include samples of educational plans that include required components, references to institutional data, defined processes and procedures, or policies. If exhibit is attached, please include the exhibit number, document title, and specific page numbers to reference in the response area below.

Per DoD MOU paragraph 4.f.(2)

Educational institutions will comply with these requirements for the return of TA funds:

- (a) Return any TA Program funds directly to the Military Service, not to the Service member.
- (b) Up to the start date, return all (100 percent) TA funds to the appropriate Military Service when the Service member does not:
 - (i) Begin attendance at the institution; or
 - (ii) Start a course, regardless of whether the student starts other courses.
- (c) Return any TA funds paid for a course that is cancelled by the educational institution.
- (d) Have an institutional policy that returns any unearned TA funds on a proportional basis through
 - at least the 60 percent portion of the period for which the funds were provided. TA funds are
 - earned proportionally during an enrollment period, with unearned funds returned based upon
 - when a student stops attending. In instances when a Service member stops attending due to a
 - military service obligation, the educational institution will work with the affected Service member
 - to identify solutions that will not result in a student debt for the returned portion.

7. **Provide an institutional policy that the institution returns any unearned TA funds on a proportional basis through at least the 60 percent portion of the period for which the funds were provided.**

This evidence may include examples of education plan that include required components, references to institutional data, defined processes and procedures, or policies. If exhibit is attached please include the exhibit number, document title, and specific page numbers to reference in the response area below.

Category 3: Accreditation and Credentialing Requirements

Per DoD MOU paragraph 3.b.
Be accredited by a national or regional accrediting agency recognized by the Department of Education (ED), approved for VA funding, and certified to participate in federal student aid programs through ED under Title IV of the Higher Education Act of 1965.
Per DoD MOU paragraph 3.i.
The educational institution will obtain the approval of their accrediting agency for any new course or program offering, provided such approval is required under the substantive change requirements of the accrediting agency. Approval must be obtained before the enrollment of a Service member into the new course or program offering.
Per DoD MOU paragraph 4.c.(5)
Degree requirements and evaluated educational plans will meet educational requirements for credentialing in stated career field and graduates of a program will be eligible for relevant professional license or certification. Educational institutions will disclose any conditions (state or agency limitations) or additional requirements (training, experience, or exams) required to obtain relevant credentials.

8. Provide a list of academic programs operating at your educational institution with programmatic accreditation. While regional and national accreditation certifies an institution to grant degrees, some specific programs require additional outside accreditation to validate the degree in the work force. For instance, an institution that offers an Architecture program must obtain a National Architectural Accrediting Board (NAAB) accreditation for its students to become AIA-certified architects.

If such programs are offered, the response should be listed below or submitted as an exhibit with a preferred format in Microsoft Excel. If exhibit is attached, please include the exhibit number, document title, and specific page numbers to reference in the response area below.

9. Provide evidence that the institution discloses any conditions (state or agency limitations) or additional requirements (training, experience, or exams) required to obtain professional credentials and/or licensure necessary to be able to obtain employment in that field, e.g. Nursing or Architecture.

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This evidence may include samples of educational plans that include required components, references to institutional data, defined processes and procedures, or policies. If exhibit is attached, please include the exhibit number, document title, and specific page numbers to reference in the response area below.

Category 4: Academic Counseling and Post-Graduation Job Opportunities

Per DoD MOU paragraph 4.c.(1)
Educational institutions will disclose general degree requirements for the Service member’s educational program (evaluated educational plan) to the member and his or her Service before the enrollment of the Service member at the educational institution.
Per DoD MOU paragraph 4.c.(4)
Degree requirements in effect at the time of each Service member’s enrollment will remain in effect for a period of at least 1 year beyond the program’s standard length, provided the Service member is in good academic standing and has been continuously enrolled or received an approved academic leave of absence. Adjustments to degree requirements may be made as a result of formal changes to academic policy pursuant to institutional or departmental determination, provided that: (a) They go into effect at least 2 years after affected students have been notified; or (b) In instances when courses or programs are no longer available or changes have been mandated by a State or accrediting body, the educational institution will identify low or no cost solutions, working with affected Service members to identify substitutions that would not hinder the student from graduating in a timely manner.

10. Provide evidence that the institution’s educational plans for Service members detail the consistent, unchanging requirements, conditions and expected timeline for graduation/program completion.

This evidence may include samples of educational plans that include required components, references to institutional data, defined processes and procedures, or policies. If exhibit is attached, please include the exhibit number, document title, and specific page numbers to reference in the response area below.

Per DoD MOU paragraph 3.n.(1)
[Educational institutions will] disclose its transfer credit policies and articulated credit transfer agreements before a Service member’s enrollment. Disclosure will explain acceptance of credits in transfer is determined by the educational institution to which the student wishes to transfer and refrain from making unsubstantiated representations to students about acceptance of credits in transfer by another institution.
Per DoD MOU paragraph 4.c.(2)
In addition to providing degree requirements, the educational institution will provide to Service members who have previous coursework from other accredited institutions and relevant military training and experiential learning an evaluated educational plan that indicates how many, if any, transfer credits it intends to award and how these will be applied toward the Service member’s educational program. The evaluated educational plan will be provided within 60 days after admission to the educational institution in which the individual has selected a degree program and all required official transcripts have been received.

11. Provide evidence that the institution discloses articulated credit transfer agreements and policies regarding transfer credit to Service members prior to enrollment in the institution. This disclosure entails an evaluated educational plan that indicates how many, if any, transfer credits will be applied toward the Service member's educational program.

This evidence may include samples of educational plans that include required components, references to institutional data, defined processes and procedures, or policies. If exhibit is attached, please include the exhibit number, document title, and specific page numbers to reference in the response area below.

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Per DoD MOU paragraph 3.g.

Designate a point of contact or office for academic and financial advising, including access to disability counseling, to assist Service members with completion of studies and with job search activities.

- (1) The designated person or office will serve as a point of contact for Service members seeking information about available, appropriate academic counseling, financial aid counseling, and student support services at the educational institution.
- (2) The point of contact will have a basic understanding of the military tuition assistance program, ED Title IV funding, education benefits offered by the VA [Department of Veterans Affairs], and familiarity with institutional services available to assist Service members.
- (3) The point of contact does not need to be exclusively dedicated to providing these services and, as appropriate, may refer the Service member to other individuals with an ability to provide these services, both on- and off-campus.

- 12. Provide evidence showing that the institution has management controls in place and designates a point of contact that is trained and qualified about the Tuition Assistance program, the Department of Education Title IV funding, Veterans Affairs education benefits, and familiar with institution-based services to Service members who are seeking information about academic counseling, financial aid counseling, job search support, or other student support services at the educational institution.**

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Evidence may include job descriptions, position requirements, references to employee manuals or handbooks, employee training, defined processes and procedures, or policies. If exhibit is attached, please include the exhibit number, document title, and specific page numbers to reference in the response area below.

Per DoD MOU paragraph 3.i.

Have a readmissions policy for Service members that:

- (1) Allows Service members and reservists to be readmitted to a program if they are temporarily unable to attend class or have to suspend their studies due to service requirements.
- (2) Follows the regulation released by the Department of Education (34 C.F.R. 668.8) regarding readmissions requirements for returning Service members seeking readmission to a program that was interrupted due to a Military service obligation, and apply those provisions to Service members that are temporarily unable to attend classes for less than 30 days within a semester or similar enrollment period due to a Military service obligation when such absence results in a withdrawal under institution policies. A description of the provisions for U.S. Armed Forces members and their families is provided in Chapter 3 of Volume 2 of the Federal Student Aid Handbook.

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13. Provide the institutional readmissions policy that aligns with provisions for Service members provided in Chapter 3 of Volume 2 of the Federal Student Aid Handbook.

This evidence may include samples of educational plans/student handbook that include required components, references to institutional data, defined processes and procedures, or policies. If exhibit is attached, please include the exhibit number, document title, and specific page numbers to reference in the response area below.