

---

# **DEPARTMENT OF DEFENSE REPORT: TUITION ASSISTANCE AND MILITARY SPOUSE CAREER ADVANCEMENT**

---



As requested in House Report 115-219, page 58, accompanying H.R. 3219, the Department of Defense Appropriations Bill, 2018

## **OFFICE OF THE UNDER SECRETARY OF DEFENSE FOR PERSONNEL AND READINESS**

The estimated cost of this report or study for the Department of Defense is approximately \$2,400 for the 2018 Fiscal Year. This includes \$30 in expenses and \$2,370 in DoD labor.

Generated on 2018Jul18 RefID: F-9AAB477

## TABLE OF CONTENTS

Table of Contents.....	2
Executive Summary.....	3
I. Introduction.....	3
II. Tuition Assistance.....	4
III. DoD Voluntary Education Partnership Memorandum of Understanding (MOU).....	5
a. Partnering Through MOU.....	5
b. MOU Compliance.....	6
IV. Transparency and Appropriate Information.....	8
a. DoD's Decision Support Tools.....	9
b. Information Sharing.....	10
c. Costs and Financial Transparency.....	12
d. Postsecondary Education Complaint System.....	13
e. Graduation Rates.....	14
V. Counseling.....	15
a. Counseling Support Structure.....	15
Figure 1.....	15
b. Central Counseling Policy.....	16
VI. Military Service Specific Policies.....	16
a. Army.....	17
b. Air Force.....	17
c. Marine Corps.....	17
d. Navy.....	17
VII. Military Spouse Career Advancement Account.....	17
VIII. Conclusion.....	18
References.....	20
List of Acronyms and Abbreviations.....	20

## EXECUTIVE SUMMARY

This report is responsive to the request included in the House Report 115-219, page 58, accompanying H.R. 3219, the Department of Defense (DoD) Appropriations Bill, 2018, requesting that the Under Secretary of Defense for Policy, “in conjunction with the Service Secretaries, submit a report that describes the steps the Department is taking to ensure that Service members are given appropriate information about educational institutions, including for-profit colleges, with graduation rates significantly below the national average.” Over the last five years, the DoD has purposefully strengthened its oversight of the Voluntary Education (VolEd) program, to include the Tuition Assistance (TA) program, through enhanced policies and protections, tailored educational tools, and resources leveraged from partner agencies. This report reviews actions taken and measures put into place that strategically improve the education experience for Service members and spouses. While the request did not specifically call for actions taken to address the Military Spouse Career Advancement Account (MyCAA), applicable information on spouse education policies, procedures, support tools, and resources have been included for context.

## I. INTRODUCTION

The DoD views the TA program as critically important to the warfighting readiness of our Service members, as it supports their professional and personal growth and facilitates their eventual assimilation into the civilian workforce. The DoD’s position is that educational pursuits conducted off-duty prepare individuals to think critically, develop leadership skills, and acquire tools essential to meet 21st century challenges.

DoD TA policies include a wide range of protections for Service members, and the Department works closely with the Military Services, installation commanders, education center officials, professional education counselors, and educational institution partners to implement and enforce all such policies and protections. In the nearly 70 year history of DoD TA, the development of centralized policy related to “protections” is relatively new. Prior to Presidential Executive Order (EO) 13607, “Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans, Spouses, and other Family Members,” the concept of protections for TA users was almost entirely resident in local education counselors. By virtue of their experience working with Service members, counselors retained awareness of, and information on, those factors of higher education of primary concern to their counselees. For example, it was quite common for significant proportions – approaching or beyond half – of all Service members to have already been marketed by educational institutions such that their minds were made up about where to go to college and what to study. Thus counselors tended to focus on factors that could mitigate time to degree completion, reduce costs, or positively influence risks to course completion. It should also be noted that prior to EO 13607, almost any educational institution could be locally approved for the receipt of TA funds.

Today, DoD has embraced the concepts of “protection” and “decision support” across the enterprise by centralizing many of the policy and oversight functions concerning educational institutions participating in the TA program. These efforts, in combination with professional



counseling and enhanced information and awareness tools, provide Service members with the resources they need to make an informed decision and choose an educational institution that best meets their personal and professional needs. As such, DoD does not focus specifically on any one factor (e.g., for-profit status or graduation rates with respect to the national average) but offers a holistic approach that provides all relevant and actionable information to support a Service member's decision making process, tailored to the unique needs of the individual. Ultimately, the Department's goal is to ensure our Service members have the information and support they need to make informed decisions concerning their well-earned Federal educational benefits.

## II. TUITION ASSISTANCE

The Office of the Under Secretary of Defense for Personnel and Readiness (OUSD(P&R)) provides policy and oversight of DoD's VolEd Program, including the TA program. Authorization for the TA program can be found in sections 2006a and 2007 of title 10, United States Code, and DoD policy is found in Department of Defense Instruction (DoDI) 1322.25, "Voluntary Education Programs." The DoD TA program is a voluntary, off-duty program. It provides Service members with financial assistance to pursue and achieve academic professional goals (i.e., earn an academic degree or certificate) during their off-duty time, which in turn assists in job performance, promotion potential, self-development, and personal quality of life by opening personal growth pathways, both while in uniform and following uniformed service. During fiscal year (FY) 2017, the TA program funded more than 256,000 Service members enrolled in 726,000 courses at a cost of \$486 million.

Current DoD policy permits the Military Services to pay tuition toward the cost of college courses that are part of a degree or certificate program, up to \$250 per semester-hour, with a maximum of \$4,500 for each FY. Only tuition is covered; books and fees are not covered by TA. Service members stationed all over the world can select an educational institution and program of study to fit their military and personal schedules, as well as their educational and career goals.

It is important to note that DoD does business only with educational institutions that adhere to the rules of certain other Federal and state agencies. In order to receive TA funding, all educational institutions, regardless of type (public or private, non-profit or for-profit, campus based or completely online), must first meet numerous industry standards, to include accreditation by a national or regional accrediting body recognized by the Department of Education (ED), compliance with state authorization requirements, state-approval for the use of veterans' education benefits, and participation in Federal student aid programs.

The TA program is structured to provide Service members with both *passive protections* from bad actions by educational institutions and *active tools* so that they can acquire valuable information needed to make informed decisions concerning their TA investment. DoD's passive Service member protections include the pre-screening and annual review of educational institutions (mentioned in the introduction to this report, and further explained in the "DoD Voluntary Education Memorandum of Understanding" section). The active tools available to



Service members include career planning tools that help identify the academic certificates and degrees they will need, comparison tools that allow them to explore institutional characteristics, cost tools that minimize or prevent educational institutions from manipulating costs to encourage enrollment, and a robust compliance system that empowers Service members to report and track both educational institution and agency responses to perceived bad actions. Each of these are described in detail in the “Transparency and Appropriate Information” section.

Each Service member’s participation in DoD-supported VolEd programs begins with a “visit” to an installation education center, on-line through their Military Services’ education portal, and/or via phone call to a virtual education center. There are approximately 245 DoD education sites worldwide, to include contingency areas (e.g., Kuwait and Djibouti). During these visits, professional education counselors present Service members with an extensive menu of options (e.g., goal identification, academic readiness assessment), provide details about specific programs, help members review and analyze courses of study, determine professional and personal goals, assess academic readiness, and accomplish administrative tasks to ensure that Service members receive maximum exposure to and benefits from available programs. Service members are also provided information on the DoD TA program, veteran’s education benefits, Federal student aid (e.g., grants and loans), and other funding options available to them.

### **III. DOD VOLUNTARY EDUCATION PARTNERSHIP MEMORANDUM OF UNDERSTANDING (MOU)**

#### **a. Partnering Through MOU**

Unlike other Federal educational benefit programs (e.g., Federal Student Aid or GI Bill), the TA program has no statutory enforcement mechanisms for governance. Instead, DoD leverages the built-in protections of these other statutory programs and pre-screens those educational institutions that wish to participate in TA. This screening is accomplished through the institution’s application for a DoD VolEd Partnership MOU. The Department developed the DoD VolEd Partnership MOU as a companion to its DoD policy, to ensure all Service members participating in off-duty, postsecondary education programs from educational institutions (including both physical campuses and online schools that accept TA funds) are uniformly provided quality education programs. The DoD VolEd Partnership MOU is a tool that is used to extend the Department’s policy expectations into enforceable actions.

DoD has approximately 2,700 participating educational institutions from all sectors (public, private non-profit, and private for-profit) providing off-duty education programs for Service members. The Department maintains oversight through a signed MOU with each educational institution. Educational institutions are required to consent to the requirements of the DoD VolEd Partnership MOU in order to participate in the VolEd Program, most notably the TA program, regardless of sector, structure, or delivery variations. Prior to signing the MOU and participating, educational institutions must meet certain pre-conditions, to include being:

- In compliance with state requirements and laws.

- State-approved for the use of veterans' education benefits (e.g., GI Bill).
- Certified to participate in Federal student aid programs through the ED under the Higher Education Act of 1965 (Title IV).
- Accredited by a national or regional accrediting body recognized by the ED, conducting programs only from among those authorized by the educational institution.

By signing the MOU, educational institutions commit to enhanced protections for Service members, agreeing to:

- Disclose basic information about the school's programs and costs, including tuition, fees, and other charges to Service members.
- Charge the same tuition to all Service members enrolled in the same course, regardless of the Service component.
- Undergo, when requested, a third-party compliance review referred to as the DoD VolEd Institutional Compliance Program (ICP).
- Recognize, accept, and award Prior Learning Assessment (PLA) credit, where appropriate, from the Joint Service Transcript and the community college of the Air Force transcript. These transcripts are official documentation of military training, education, and experience that may be used to assess college credit recommendations.

The aforementioned DoD VolEd Partnership MOU provisions serve to support the DoD's program oversight, enforcement of program requirements, and evaluation of compliance for participating educational institutions.

## **b. MOU Compliance**

By signing the MOU, educational institutions agree to abide by a set of behaviors, processes, and policies, with a focus on improving services delivered to military-connected students. The DoD's primary tool for actively ensuring MOU compliance is the VolEd ICP. This is a clearly-defined evaluation program that assesses an educational institution's compliance with the MOU under the DoD TA program. The DoD VolEd ICP was developed based on the DoD's requirements and using best practices from across industry and government, to ensure a rigorous, transparent evaluation of educational institutions, while focusing on compliance with the tenets of the DoD MOU.

The goal of the DoD VolEd ICP is to provide oversight to reduce the risk of unsatisfactory educational outcomes and increase the opportunities for Service members, educational institutions, and the DoD as a whole. Each year, the DoD completes a review of 250 educational institutions, with 200 selected at random and 50 selected based on the following factors:



- **Course Completion Rate:** The number of TA students enrolled in courses at an educational institution, who complete a course in a given year, divided by the total number of TA students enrolled in courses at the educational institution.
- **Complaints:** Total number of verified complaints in the DoD Postsecondary Education Complaint System during a given year.
- **Enrollment Changes:** Average rate of change in enrollment for TA students.
- **Cost-to-Graduation Ratio:** Graduation rate relative to cost.
- **Outcome Stability Ratio:** Average graduation rate over a given number of years.
- **Transaction Volume:** Total number of enrollment transactions processed by the Military Services for an educational institution during a reporting year.

Participation in the DoD VolEd ICP helps educational institutions better understand MOU compliance, and as a result of this increased level of understanding, allow for self-correction, thereby improving the overall experience for Service members. The policies, findings, and recommendations also provide a refresher on MOU expectations, while providing information as to how program policy compliance could be strengthened. The DoD VolEd ICP provides feedback to educational institutions in four main areas:

- **Recruiting, Marketing, and Advertising:** The TA program is designed to provide opportunities for Service members to realize their educational goals while ensuring judicious use of taxpayer dollars. In doing so, the practices that educational institutions use to attract prospective Service members must adhere to specific legal and ethical guidelines established in the MOU.
- **Financial Matters:** Financial matters pertain to the cost of attendance, pre- and post-enrollment tools and processes, and the ease with which prospective Service members can access information. MOU compliance requires that Service members have easy access to clear and accurate information regarding financial aid options. This includes access to a trained counseling staff who can provide accurate and up-to-date information regarding the breakdown of institutional costs and recommendations regarding individual financial choices.
- **Accreditation:** All institutions must be accredited by a national or regional accrediting body recognized by the ED and conduct programs only from among those authorized by the institution's main administrative and academic office, in accordance with standard procedures for authorization of degree programs established by the institution. An institution must keep this information up-to-date and easily accessible to the general public.
- **Post-Graduate Opportunities:** Institutions should make information readily available to prospective and current Service members, which is designed to aid them in their post-academic life. This information should include the unchanging degree plans and requirements needed to complete an academic program, guidance on professional

opportunities available upon completion of a degree/program, and processes regarding readmission policies for Service members who are required to fulfill their military obligations while attending the institution.

In accordance with the DoD VolEd Partnership MOU, educational institutions must address findings of noncompliance within six months of the DoD VolEd ICP review. Educational institutions that are unable or unwilling to participate in the DoD VolEd ICP, and those that demonstrate an unwillingness to resolve report findings of noncompliance, are provided notice of DoD's intent to cancel the DoD VolEd Partnership MOU.

While the DoD VolEd Partnership MOU and DoD VolEd ICP provide passive protections to Service members receiving TA benefits, DoD also provides Service members with active tools to facilitate increased transparency and ready access to valuable information needed to make better informed decisions concerning their TA investment.

#### **IV. TRANSPARENCY AND APPROPRIATE INFORMATION**

The value and weighting of institutional variables applied by any one of the DoD's 256,000 annual TA users to determine their own best-fit educational institution is unknowable. Surveys have revealed that common priorities include accessibility, cost, time-to-completion, reputation, and popularity. DoD also knows that institutional advertising and marketing are factors that can influence Service member priorities<sup>1</sup>. While counseling or centralized modeling cannot always account for all the personal and professional variables that influence Service members' decisions, DoD strives to provide sufficient relevant and timely information that is meaningful to each Service member. For this reason, DoD has focused on packaging the myriad sources of data into areas that can be browsed by Service members as their interests and priorities dictate.

Some of the ways that DoD organizes this information for Service member consumption are listed below. Education counselors assist Service members in navigating the tools available to make informed choices about educational options. The counselor is also an invaluable resource, helping Service members to know which protections to invoke when they have questionable interactions with an educational institution.

Relevant and actionable consumer information is provided to Service members through various means, including DoD's decision support tools, information sharing, cost and financial transparency requirements, a complaint system, and graduation and completion rates outcomes.

##### **a. DoD's Decision Support Tools**

The DoD has developed decision support tools to help enforce and augment the protections incorporated in DoDI 1322.25 and to further promote transparency. Decision support tools

---

<sup>1</sup> Department of Defense Report on Voluntary Education Programs Advertising and Marketing, August 2016, Pursuant to Request in Joint Explanatory Statement Accompanying the Consolidated Appropriations Act, 2014 (P.L. 113-76)



streamline and centralize pertinent information that Service members need to step through major decisions related to their participation in the VolEd program.

In April 2015, DoD launched a decision support tool called TA DECIDE. TA DECIDE provides a dynamic information and comparison tool designed specifically to aid participants of the DoD TA program in making informed choices on schools and education programs. The TA DECIDE engine is fueled by more than 10 recognized and trusted data sources from across DoD, ED, and the Department of Veterans Affairs (VA). TA DECIDE specifically identifies the institution's sector (public, private non-profit, and private for-profit), as well as graduation rates, for Service member awareness and consideration. Another available feature is the capability to make side-by-side comparisons of schools. The tool provides school information, including contact information and websites, tuition and fees, course completion and graduation rates, complaint information, and military and veteran student information. TA DECIDE can be accessed at: <https://www.dodmou.com/TADECIDE>.

For Service members interested in pursuing occupational credentials, the Military Services' Credentialing Opportunities On-Line (COOL) applications align military training and experience with civilian credentials. COOL provides access to search over 1,700 unique occupational credentials that have been mapped to enlisted military occupations through comparison of military job duties against the competencies covered by the civilian credential. Education and gap training requirements needed to meet the requirements of occupational credentials may be provided by educational institutions already participating in the TA program. The Military Services' COOL websites can be accessed at:

- <https://www.cool.army.mil/index.htm>
- <https://www.cool.navy.mil/usn/index.htm>
- <https://www.cool.navy.mil/usmc/index.htm>
- <https://afvec.langley.af.mil/afvec/Public/COOL/Default.aspx>

Prior to making final decisions and actually signing up for college classes, Service members are encouraged to take an online course called Higher Education Preparation (HE PREP). This course<sup>2</sup> is a tool that assists Service members in creating a personalized plan of action that can be used for future reference. HE PREP helps Service members explore new opportunities, guides them through a variety of decisions involved in choosing a career goal, and points them toward an educational path to reach the chosen goal. HE PREP assists Service members in:

- Completing a standardized individual assessment tool to assess their aptitudes, interests, strengths, and skills.
- Creating a personal education folder that will include a gap analysis, academic readiness assessment, and career research.

---

<sup>2</sup> Available at <https://jkodirect.jten.mil/Atlas2/page/login/Login.jsf>

- Completing a comparison of higher education or career technical training options.

In an effort to provide even better insight into the linkages and alignment of both academic and occupation credentials that may be required for a particular career, DoD has recently piloted a decision support tool called Career Path DECIDE. The Career Path DECIDE tool streamlines a Service member's pathway to choosing and earning meaningful credentials that are recognized in the civilian sector. With this tool, Service members can explore career fields, the academic and technical credentials required, as well as the best opportunities for integrating and stacking recommended credentials. Current user testing is showing Career Path DECIDE to be a powerful aid to Service members in mapping their overall life trajectory as they begin to contemplate transition options earlier in the military life-cycle. Once a customized mix of appropriate credentials has been determined for a Service member's individual pathway, he or she is encouraged to utilize TA DECIDE or COOL to further explore specific credentials and credential providers.

## **b. Information Sharing**

The Department has executed a comprehensive strategy via an interagency information sharing MOU with ED, VA, and the Consumer Financial Protection Bureau (CFPB), to strengthen enforcement and compliance mechanisms. The interagency information sharing MOU allows DoD to leverage existing decision tools created by these agencies. Such tools are beneficial to Service members. These tools include:

- ED's College Scorecard, a planning tool and resource to assist prospective students and their families as they evaluate options in selecting a school. Located at: <http://collegecost.ed.gov/scorecard/>.
- ED's College Navigator tool, a consumer tool that provides school information to include tuition and fees, retention and graduation rates, use of financial aid, and student loan default rates. College Navigator features a cost calculator and school comparison tool. Located at: <http://nces.ed.gov/collegenavigator/>.
- ED's Financial Aid Shopping Sheet, a sample aid award letter designed to simplify the information that prospective students receive about costs and financial aid so they can easily compare institutions and make informed decisions about where to attend school. Located at: <http://www2.ed.gov/policy/highered/guid/aid-offer/index.html>.
- VA's GI Bill<sup>®</sup> Comparison Tool, which makes it easier to research colleges and employers approved for the GI Bill,<sup>®</sup> including information on outcome measures of providers (i.e., graduation, completion, and transfer rates) and an estimate of benefits. Located at: <https://www.vets.gov/gi-bill-comparison-tool>.
- CFPB's Paying for College webpage, which can be used by prospective students to enter the names of up to three schools, receive detailed financial information on each one, and to enter



actual financial aid award information. Located at:  
<http://www.consumerfinance.gov/paying-for-college/>.

Each of these tools provides tailored perspectives related to an institution's sector (public, private non-profit, and private for-profit) and/or graduation rates. This information is, by extension, shared with Service members to aid in the decision making process. In fact, with the exception of the VA's GI Bill® Comparison Tool, which post-dates DoDI 1322.25, DoD policy requires educational institutions to "provide each prospective military student with specific information to locate, explain, and properly use" these ED and CFPB tools, prior to enrolling the Service member.

The interagency information sharing MOU also allows DoD access to information collected by ED's monitoring of schools participating in Title IV programs, which includes:

- Financial Health, which is based on the educational institution's financial responsibility. An assessment of the educational institution's cash reserves and history of meeting past obligations is provided.
- Student Loan Cohort Default Rate, which uses student loan cohort default rates as an implicit proxy for education quality.
- 90/10 Rule, which is a requirement that to participate in Title IV programs, for-profit educational institutions cannot receive more than 90 percent of their revenue from Title IV program funds.
- Incentive Compensation, which prohibits educational institutions participating in Title IV programs from compensating recruiters based directly or indirectly on their success in enrolling students or securing financial aid for them.
- Misrepresentation. Educational institutions participating in Title IV programs may not engage in substantial misrepresentation of the nature of the institution's educational program, its financial charges, or the employability of its graduates.

These oversight measures provide DoD and the Military Services with additional insight into an institution's ability to provide a quality education and services to Service members. ED considers educational institutions that are financially unstable or fail to comply with student loan default rate and 90/10 requirements, more likely to be unable to fulfill their promises to provide students with quality program offerings. DoD utilizes ED's compliance data to inform its oversight efforts with regard to those institutions that sign DoD VolEd Partnership MOUs to participate in the DoD TA program.

The Department also relies on the ED's recognition of accreditation as the keystone against which DoD measures an institution's eligibility to receive TA funds, and ensures all institutions participating in the TA program maintain accreditation. DoD regularly receives an electronic data feed from ED which confirms the institutions' accreditation status. ED certifies an educational institution's eligibility to participate in Federal student aid by determining that an

educational institution is accredited by an accrediting agency it recognizes, is authorized to operate within a state, and meets certain administrative and financial requirements. ED compliance information alerts DoD to issues that institutions may be experiencing that could affect the institution's quality of education.

### **c. Costs and Financial Transparency**

The DoD requires educational institutions to be transparent about financial cost and performance outcomes, and to provide high-quality academic and student support services to Service members. Educational institutions that have signed a DoD VolEd Partnership MOU to participate in the DoD TA program, are required to provide meaningful information to Service members prior to enrollment. This information is crucial in assisting Service members in making choices about how to use their Federal and military educational benefits, and in researching and selecting the best educational institution to meet their needs. Meaningful information provided to Service members by educational institutions participating in the DoD TA program includes:

- Accreditation information, institutional and programmatic.
- Tuition costs and fees.
- Program and degree offerings.
- Refund policies.
- Readmission policies.
- Clear and complete explanation of available financial aid, including Title IV of the Higher Education Act of 1965, as amended.
- Information about the differences between private and Federal student loans, to include terms, conditions, repayment, and forgiveness options.
- Disclosure of the educational institution's student loan Cohort Default Rate, the percentage of students who borrow, and how the institution's default rate compares to the national average.
- Graduation rates.

Some of this information is submitted centrally through the DoD VolEd Partnership MOU application (i.e., tuition costs and fees, program and degree offerings, and policies on refund and readmission) to enhance transparency and uniform application across the DoD. A school's compliance with requirements for the provision of information and disclosures are reviewed during the third party review process (as described in the MOU Compliance section) for compliance.



#### **d. Postsecondary Education Complaint System**

The DoD implemented the Postsecondary Education Complaint System (PECS) on January 30, 2014, in accordance with EO 13607. PECS provides an efficient, fair, and timely submission and resolution process that empowers Service members and spouses to report their experiences with schools they feel demonstrate deceptive, fraudulent, or misleading practices.

PECS serves as a mechanism that allows Service members to submit complaints directly related to the “Principles of Excellence” established by EO 13607, including issues such as:

- Program quality – misrepresentation of degree programs.
- Recruiting – multiple unsolicited calls or high pressure recruitment tactics.
- Marketing materials make claims that are not truthful.
- Tuition/fees not found on website.
- Total cost of the program is not clear in marketing materials or on website.
- The School does not return any unused TA funds when a military TA recipient withdraws.
- The School encourages Service members and spouses to take out costly private or institutional loans, even though the GI Bill or Federal financial aid is available.
- Accreditation – misleading statements concerning accreditation.
- Courses requiring hands-on training and/or licensing are overwhelmingly online.

The DoD has visibility into all complaints submitted and monitors the complaints to ensure all concerns are reviewed and followed up for corrective actions by designated Education Case Managers. Education Case Managers work through the issues identified in the complaint with the Service member and the educational institution, and provide continuous status updates to Service members until the case has been resolved. Complaints are also shared with DoD’s Federal partner agencies (i.e., VA, ED, and CFPB) as deemed appropriate for additional review. PECS is web-based and accessible at:  
<https://pecs.militaryonesource.mil/pecs/dodpecs.aspx>.

The number and nature of PECS complaints associated with a given institution are noted in TA DECIDE. This information is available to assist military students in planning, budgeting, and making informed educational choices, and in holding educational institutions to the highest standards.

## **e. Graduation Rates**

DoD is keenly interested in graduation rates as they apply to our population of TA users. In 2017, the Department submitted a report to Congress tracing the graduation outcomes of cohorts of TA recipients from 1999-2015<sup>3</sup>. This report revealed that approximately 9 percent of Service members in any given TA cohort go on to complete a degree while still in uniform. Assigning qualitative value to this statistic can be difficult because DoD has no means of tracking what happens to the millions of TA users after they leave military service, nor do results reflect the level of degree attained or any imputed quality, rigor, or economic value of degrees earned. Nevertheless, due to the importance of degree attainment to long-term economic factors, the Department has formalized goals for improving our internal graduation rates.

Accordingly, information about institutional graduation rates – including those significantly below the national average – is an important element of the many variables that factor into planning for a successful experience in higher education. One way that DoD demonstrates institutional graduation rates to Service members is through decision support tools such as TA DECIDE and Career Path DECIDE. In these tools, DoD identifies each institution’s graduation rate as reported through ED’s Integrated Postsecondary Education Data System (IPEDS) data<sup>4</sup>.

DoD does, however, assign two caveats to the utility of graduation rate measures for our population. First, analysis of the available data on graduation rates may not be fully generalizable to the population of TA users. For example, IPEDS relies heavily on first-time/full-time student data; part-time and adult learner data sets do not reflect the “burst” usage that is typical of Service members. For these reasons, DoD relies much more heavily on course completion rates than on graduation rates.

The second caveat is that one single variable might not tell the entire story of program quality. For example, one might imagine a highly rigorous and selective program with graduation rates below, but economic outcomes well above, national averages. Thus, it could be a disservice to elevate the importance of graduation rates within DoD’s decision support tools.

For these reasons, and because the needs and desires of our population are so diverse, DoD takes care not to elevate any one factor above any other.

## **V. COUNSELING**

### **a. Counseling Support Structure**

DoD maintains that a military student’s most effective use of passive protections and active decision support tools is through extensive and regular interactions with a professional education

---

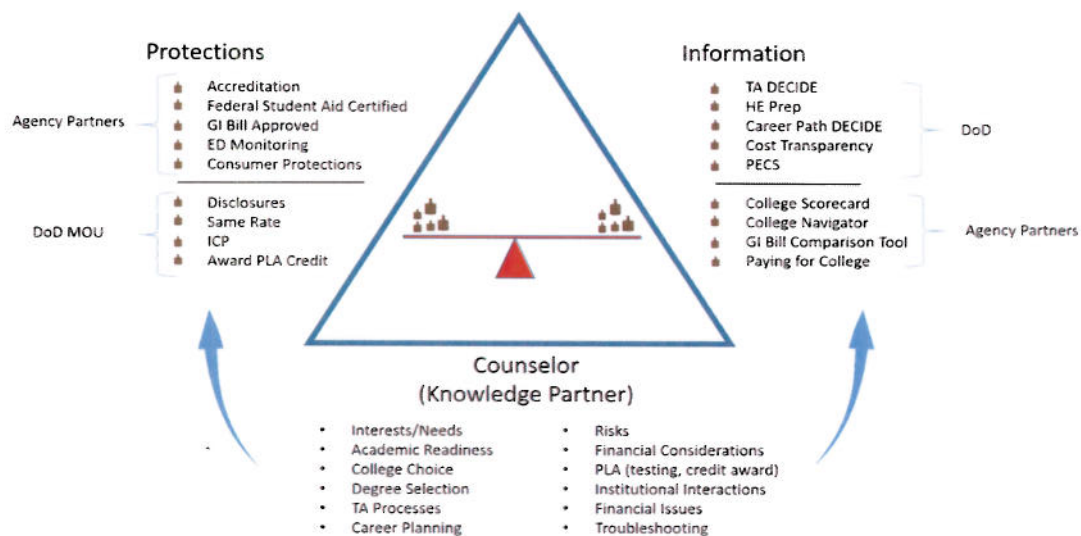
<sup>3</sup> Department of Defense Report on Voluntary Education Programs, April 2017, Tracking Outcomes: A Report to Congress on Voluntary Military Education Programs, in fulfillment of a requirement found in Department of Defense Appropriations Bill 2014 (Report 113-85)

<sup>4</sup> U.S. Department of Education’s Integrated Postsecondary Education Data System (IPEDS), <https://nces.ed.gov/ipeds/>



counselor. The counselor serves as a “knowledge partner,” helping Service members to balance both *protection* and *information* priorities for their individual, customized needs so that they are better assured of a positive educational outcome. Figure 1, “Conceptual Counseling Support Triangle,” depicts the balance between protections and information, as well as the counselor’s role as the third side of the support triangle. In this model, the counselor helps each individual Service member identify the factors important to her or him, and how much weight each should be given. In this way, the Service member can make more informed decisions about the path most supportive of his or her desired outcomes.

**Figure 1: Contextual Counseling Support Triangle**



## **b. Central Counseling Policy**

Each Military Service is responsible for administering and managing its respective DoD TA programs; however, the uniform policies reflected in the DoDI 1322.25 are used to govern the administration of all programs and to ensure protective measures can be readily invoked. The Military Services place professional education counselors at installations and virtually online to provide assistance and information to Service members. These education experts are well versed in the protection and information tools identified in Figure 1 on page 15, as well as a range of individual support tools, such as interest inventories, academic readiness, and PLA testing services, that provide foundational support to the development and execution of a personal education plan for each Service member. DoD policy requires the completion of counseling sessions prior to a Service member's receiving TA. Counseling sessions typically consist of the following:

- Determination of educational goals.
- Completion of a learning assessment (transcript review/recommended credit).
- Determination of academic programs of interest.
- Advice on the range and types of institutions the Service member can attend, and academic program options, leading to an education goal.
- Assessment of a Service member's readiness to accomplish degree requirements, as outlined in the evaluated educational degree plan.
- Discussion and review of occupational credentials that can be obtained concurrent to academic pursuits.
- Discussion of credit-by-examination options.
- Discussion of payment options and the use of education benefits for postsecondary courses, to include the DoD TA program, VA education benefits programs, state and Federal grants and loans, commercial lending, and out-of-pocket costs.

DoD education counselors are trained to use, and to teach others to use, the decision support tools addressed in Figure 1 on page 15, under the "Information" header of the support triangle.

## **VI. MILITARY SERVICE SPECIFIC POLICIES**

In addition to all of the aforementioned safeguards, tools, and counseling support, the Military Services have implemented additional policies and procedures aimed at enhancing the protections and information available to Service members.



**a. Army**

The Army requires all Soldiers requesting participation in the TA program to engage with an online decision support tool called “VIA.” This tool encourages Soldiers to view and compare selected educational institutions. Some of the data elements that are compared include first to second year retention rates, overall 6-year graduation rate, and the proportion of students which transfer to a new educational institution prior to degree completion. Once a degree and institution are selected in VIA, an Army Education Counselor must review the Soldier’s choices, consider other relevant information such as grade point average, and either approve the request or recommend additional counseling and assistance.

**b. Air Force**

The Air Force requires annual virtual training and degree planning and review for their members in the early stages of TA use. Additional decision support tools that the Air Force provides include directing their members toward the TA DECIDE tool and an Air Force developed School Rating Tool that allows their members to see how others rated an educational institution. The Air Force also uses automated messaging to Service members. This messaging incorporates a military life cycle “counseling touch point” approach to provide standardized information regarding TA, VA, and other education benefits.

**c. Marine Corps**

The Marine Corps requires Marines to complete the Marine Corps Institute Personal Financial Management Course and the DoD’s HE PREP course prior to being approved for TA. These courses assist Marines in understanding and overcoming the financial risks associated with higher education pursuits and help them build confidence in their ability to remain mission ready, despite the increased demands on their time, attention, and finances.

**d. Navy**

Navy requires all first-time TA users to complete a pre-requisite online preparation course called Navy Virtual Counseling 101, prior to meeting with an education counselor. The course explains the basics of higher education, including information such as how to establish education goals and how to discern between different types of accreditation. The course also informs Sailors about how to use decision support tools (as depicted in Figure 1) and how to understand information included in the Joint Service Transcript. Through completion of this content, Service members are better prepared to have an initial counseling session with an education counselor.

## **VII. MILITARY SPOUSE CAREER ADVANCEMENT ACCOUNT**

OUSDP(P&R) also provides policy and oversight of DoD’s Spouse Education and Career Opportunities (SECO) program, including the MyCAA program, through the Office of the Deputy Assistant Secretary of Defense for Military Community and Family Policy.

Authorization for the SECO and MyCAA program can be found in section 1784a of title 10, United States Code.

MyCAA is a workforce development program that provides focused education and career guidance to eligible military spouses worldwide, offering comprehensive resources and tools related to occupation exploration, scholarship resources, education, training and licensing. MyCAA includes a scholarship program that offers eligible spouses (those whose Service member is in the pay grades of E1-E5, O1-O2, and W1-W2) up to \$4,000 for the pursuit of an associate's degree and/or occupational license or credential to provide for a portable career with skills that can transfer with them through military moves. Eligible Spouses who already have advanced degrees, but who want or need to take coursework leading to a recognized credential can also use MyCAA. During FY 2017, more than 20,000 military spouses enrolled in more than 40,000 courses through the MyCAA program.

MyCAA leverages DoDI 1322.25 policies and protections discussed previously in this report by ensuring the educational institutions that provide support to military spouses also have a signed DoD VolEd Partnership MOU. Military spouses also benefit from the decision support tools, information sharing, and PECS provisions outlined throughout this report.

In addition, SECO provides career coaches for MyCAA to assist spouses in creating career and education plans of action that consider financial aid options, education and training program resources, and credential information. The career coaches assist spouses with appropriate decision support tools to research and find an educational institution and program of study that best meet their needs. SECO resources include assistance with academic test taking, study skills readiness, professional development, and an information hub tailored to the specific needs of spouses. Similar to the TA program, career coaches work with spouses to develop an education and training plan detailing the courses or exams necessary to obtain the desired credential; after which, the plan is approved by a career coach prior to the spouse receipt of MyCAA funds.

## **VIII. CONCLUSION**

In summary, the Department is committed to sustaining programs specifically dedicated to, and focused on, Service members and eligible military spouses. Our programs must provide relevant and accurate information essential to mapping their desired education and career paths. DoD's policies, the DoD VolEd Partnership MOU, counseling support structures, and decision support tools, together with the availability and accessibility of ED and VA resources, help to motivate and empower Service members and spouses to make informed decisions. Through application of all of these policies, processes, and resources, DoD presents "trusted source" information on an educational institution to include sector (public, private non-profit, and private for-profit) and graduation rates for Service member awareness and consideration in the decision making process. DoD does not elevate any one factor over another, given that the needs and desires of our Service members pursuing higher education are so varied.

Whether it is for TA or MyCAA, DoD leverages many of the same protections and tools to ensure our Service members and spouses have the information and support they need to make



informed decisions concerning their Federal educational benefits. Today, the concepts of “protection” and “decision support,” set in the context of expert counseling, permeate DoD policy and processes on all levels.

Although DoD policy still places emphasis on degree completion, cost, and risks to course completion, we approach these from a perspective of both passive protections for Service members and active tools that they can utilize. Passively, Service members receive the protection of engaging with DoD pre-screened educational institutions. This prescreening leverages the vast statutory and regulatory resources of other Federal agencies, and incorporates a robust compliance review process. Actively, Service members can engage with the dynamic tools that DoD provides. These include decision support tools, interagency information sharing, transparency requirements, a complaint system, and outcomes data. Even given both passive and active resources, DoD maintains that personal counseling support is critical to successfully navigating the higher education landscape.

In the five years since formalizing and centralizing these resources, DoD has provided more than 2.5 million “touches” whereby a Service member or spouse uses a decision support tool, engages with a counselor, and/or invokes one or more critical protections emplaced by DoD or its Federal agency partners. All of DoD’s efforts ensure that Service members and spouses are given appropriate information about educational institutions, including for-profit colleges with graduation rates significantly below the national average, to make the best possible decision concerning their TA or MyCAA investment.

## REFERENCES

- (a) Title 10, United States Code, Section 2007
- (b) Title 10, United States Code, Section 2006a
- (c) Title 10, United States Code, Section 1784a
- (d) Department of Defense Instruction 1322.25, “Voluntary Education Programs,” July 7, 2014. (<http://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/132225p.pdf>)

## LIST OF ACRONYMS AND ABBREVIATIONS

CFPB	Consumer Financial Protection Bureau
COOL	Credentialing Opportunities On-Line
DoD	Department of Defense
DoDI	Department of Defense Instruction
ED	Department of Education
EO	Executive Order
FY	Fiscal Year
HE PREP	Higher Education Preparation
ICP	Institutional Compliance Program
IPEDS	Integrated Postsecondary Education Data System
MyCAA	Military Spouse Career Advancement Accounts
MOU	Memorandum of Understanding
OUSDP&R)	Office of the Under Secretary of Defense for Personnel and Readiness
PECS	Postsecondary Education Complaint System
PLA	Prior Learning Assessment
SECO	Spouse Education and Career Opportunities
TA	Tuition Assistance
VA	Department of Veterans Affairs
VolEd	Voluntary Education