

VETERANS REPORTING & SUPPORT

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Veterans Reporting & Support

AACRAO is a non-profit, voluntary, professional association of more than 11,000 higher education professionals representing approximately 2,600 institutions in more than 40 countries. Its commitment to the professional development of its members includes best practice guidance on admissions strategies to meet institutional diversity objectives, delivery of academic programs in innovative ways to meet the needs of a changing student body, and exemplary approaches to student retention and completion.

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THE WORK GROUP

Established in 2017, the AACRAO Board of Directors charged the Veterans Reporting and Support Work Group with 1) assessing the feasibility of aligning the veterans reporting process with existing enrollment and compliance reporting business processes, 2) identifying issues, requirements, and potential changes to Student Information Systems (SIS) to facilitate improvements in veterans reporting, and 3) developing protocols for data collection and reporting using existing tools, as well as anticipating the future state of the reporting process.

Comprised of AACRAO members who represent diverse positions, institution types, and geographic locations, as well as other higher education stakeholders, the work group members brought an important perspective to the issue based on their daily work responsibilities on a college campus and serving the veteran populations.

In response to the Board charge, the work group engaged in the following activities:

- Evaluated and defined veteran data reporting requirements.
- Identified data elements which are part of existing compliance and enrollment reporting and have common definitions.
- Identified common data elements that are part of existing reporting operations but have different definitions.
- Identified and developed coding taxonomies for data specific to the VA.
- Evaluated technical requirements for data submission, including collaboration with SIS providers.
- Engaged with other higher education user groups (ex. NASFAA) for input and feedback.



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EXECUTIVE SUMMARY

The GI Bill®, originally enacted in 1944, paved the way for returning veterans to enter higher education. Since then, many subsequent amendments have expanded education benefits to all veterans, not only to those who served during conflicts.

The most recent legislation enacted, the Harry W. Colmery Veterans Educational Assistance Act of 2017, further expanded veterans' education benefits and strengthened compliance mandates. In addition, the Act mandated new reporting requirements, including identifying geographic-based enrollment period and submitting outcome data for veterans receiving GI Bill® benefits to Veterans Affairs (VA). These mandates add additional administrative burden for higher education institutions (HEIs). Moreover, the VA, under direction from Congress, will now look to use the data reported from institutions for benefit administration for purposes outside of that intent, such as degree completion and retention metrics.

The manual entry related to the compliance elements of the certification process (reporting), as imposed by the VA, presents challenges for institutions. During manual entry, data can be mis-keyed, undermining accuracy. Additionally, institutions offer non-standard enrollment terms, multiple student levels (undergraduate, graduate, professional, etc.), and a large array of scholarships and grants adding layers of complexity to reporting.

As a result, veteran reporting has become an administratively burdensome process that compromises student service, in part due to the lack of automation from the student information system (SIS) to the VA.

AACRAO members have expressed interest in exploring ways to improve services for student-veterans through improvements in the veteran data reporting process. The initial work on veteran data reporting was initiated in the spring of 2015 by registrars and school certifying officials (SCOs). The formal work group, created in 2017, was charged with evaluating issues, requirements and SIS functionality to facilitate veteran reporting improvement. The work group also sought to develop protocols for data collection and reporting using existing tools while anticipating the future state of the reporting process.

After considering the key veteran reporting elements -- academic program approval with State Approving Agency (SAA), education benefit processing (certification), and outcome reporting -- the work group elected to focus on outcome reporting. While we are not addressing the certification processes directly, there is a high likelihood the certification process will be revisited in the future.

The recommendation of the work group is for the Department of Veterans Affairs (VA) to partner with the National Student Clearinghouse (NSC) for outcome data. With over 97% of HEIs submitting enrollment and degree data to the NSC, it would seem logical and effective to leverage that process to fulfill the VA outcome reporting mandate. While enrollment reporting to the VA is far more challenging given the nuances and regulatory mandates, the outcome data reporting is far simpler.

This is a long-term solution where the VA would provide the cohort to NSC. NSC would calculate the rates according to the VA definitions then report the data to the VA. HEIs that do not leverage the Clearinghouse could consider doing so, or continue to report outcome data directly to the VA. While enrollment reporting to the VA for the certification process is far more challenging, it would still lead to gains as data would be reported with the intent of outcomes.

BACKGROUND

The work on veteran data reporting was initiated in the spring of 2015 by registrars and School Certifying Officials (SCOs) from the University of Missouri, University of Texas at Austin, and University of Wisconsin-Madison, and further evaluated and verified in winter 2015 by SCOs from Syracuse University, Saint Louis University, Colorado State University, and Hopkinsville Community College-Ft. Campbell, KY. Additionally, AACRAO members have expressed interest in exploring ways to improve services for student-veterans through improvements in the veteran data reporting process.

AACRAO is committed to improving services to student veterans and created the work group to explore potential benefits of aligning veteran reporting with other enrollment reporting processes. The work in 2015 strongly suggested a need from the higher education community to have valid data on the enrollment and completion activities of student veterans. After further conversation and buy-in from the community, AACRAO's Executive Board chartered this work group.

From this work came a set of proposals, including potentially leveraging existing enrollment and compliance reporting business processes, such as the National Student Clearinghouse reporting regarding completions and graduations, to help institutions more easily meet reporting and data submission requirements of the Veteran Benefit Administration (VBA).

These proposals are designed to meet the goals of comparison tool statistics and assisting with new statutes and regulations set by congress, as well as provide intuitions with tools to provide a higher level of service.

The departure from current process is the use of submitting enrollment information for benefit purposes through the tool VA-Once. VA-Once was created and is used primarily for the administration of benefits as will be discussed. However, the tool has been adapted in recent years to comply with Congress' request for outcome measures. As will be discussed, data reported for benefit purposes has limitations outside its originally intended purposes.

See page 27 of the VA Certifying Official Handbook for GI Bill Chapter information¹.

https://www.benefits.va.gov/GIBILL/docs/job_aids/SCO_Handbook.pdf

CURRENT STATE OF VETERAN REPORTING



Per CFR 21.4203², HEIs are required to report enrollment, re-entrance, change in credit hours or attendance, rate of pursuit, interruption, and termination of attendance for beneficiaries of the GI Bill® (education benefits) to the VA within 30 days of each action. In addition, all colleges/universities must report graduation or completion of program for each of said beneficiaries.

Under the GI Bill®, HEIs, students, and Veterans Affairs have responsibilities to each other as outlined below.

Higher Education

HEIs are responsible for obtaining and maintaining academic program approval from the State Approving Agency (SAA). If the HEI is centralized, then the institution must appoint a single Point of Contact (POC). HEIs are required to designate a SCO (Figure 1) who has the primary responsibility of ensuring that the institution complies with the enrollment reporting mandates. The SCO must be provided with opportunities to attend procedural training as needed. HEIs are responsible for maintaining official enrollment records and produce those records to the VA or State Approving Agency during compliance surveys (audits)³.

Figure 1. Designation of SCO³

- Percentage of employee(s) job responsibility is allocated to SCO duties as determined by number of students using GI Bill®
- Number of employee(s) assigned to the role of SCO as determined by number of students using GI Bill®
- Percentage of employee(s) job responsibility is allocated as POC as determined by number of students using GI Bill®

Students

Students must meet the GI Bill® eligibility requirements through military service or have their education benefits transferred by parents or by the VA disability/employability rating. Once the VA determines the student's education benefit level, the student must provide proof of eligibility to the higher education institution. As a student receiving GI Bill® benefits, the student must adhere to all institutional policies while attending and completing the coursework to the best of their ability.

Veterans Affairs

The VA is accountable for implementing and upholding CFR Title 38 Chapter 1 Part 21 and providing Congress with

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regulatory updates as mandated per law. The VA holds itself responsible by processing certifications and making payments to the students and HEI in a timely manner. Lastly, the VA provides training opportunities when requested by professional organizations and/or the HEIs.

Systems and Processes

The systems used for tracking, maintaining, and reporting enrollment activities differ among HEIs depending on the SIS, availability of technical resources, and the size of student-veteran population served on campus. The VA operates several intertwined systems for receiving GI Bill® applications, processing enrollment data, and paying education benefits to the student or the HEI.

Higher education institutions serve as the intermediary between the students and VA. HEIs have created distinct processes to facilitate communication to and from the student and to and from the VA. Likewise, the VA has created their own process to communicate with the student and the HEIs. A major communication challenge between the VA and HEIs is the human intervention required for the transactional flow of information. While the HEIs can optimize their communication processes through automation, manual data entry is required to enter the information in the VA system.

CURRENT STATE OF ENROLLMENT REPORTING BY INSTITUTIONS



Integrated Postsecondary Education Data System (IPEDS) data are submitted at the aggregate level from postsecondary institutions and do not have student-level information. Institutions submit data through twelve interrelated survey⁵ components about six general higher education topics in three collection cycles.

While IPEDS data covers a vast array of topics, those data elements that are significantly relevant with respect to veteran data include: enrollment, program completion, graduation and completion rates, retention, institutional characteristics, and financial aid data.

IPEDS Significant Survey Components

The 12-month enrollment count is the unduplicated headcount of students enrolled over a 12-month period. Because this enrollment measure encompasses an entire year, it provides a more complete picture of the number of students at non-traditional institutions that enroll students year-round or for short-term programs.

Among many things, this data includes unduplicated headcounts by level of student, race, ethnicity, gender, instructional

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activity, and full-time equivalent (FTE) enrollment. In Fall semesters, additional data is pulled that is used to calculate student-faculty ratios and retention rates as well.

FTE provides a meaningful combination of full- and part-time students across various types of institutions that often operate on different calendar systems and is used to calculate expenses per FTE and revenues per FTE.

IPEDS collects data on the number of students who complete a postsecondary education program and the number of postsecondary awards earned. This includes completions (total number of awards) by field of study, award level, race, ethnicity, and gender. Further information is gathered providing data on the characteristics of those earning those awards. To differentiate the types of awards, IPEDS inquires about program types, both in residence and distance education.

Field of study is categorized according to the Classification of Instructional Programs (CIP)⁶, a detailed coding system for postsecondary instructional programs. This differs tremendously from the VA coding system. While this does not directly relate to enrollment data, there could be some helpful reporting on program data and statistics with respect to Veteran enrollment.

Graduation rate data provides information on institutional productivity and helps institutions comply with reporting requirements of the Student Right-to-Know Act and the Higher Education Act. Graduation rate data are collected for full-time, first-time degree and certificate-seeking (non-degree) undergraduate students. This data collected includes the number of students completing their program within a time period of one and half times the normal program length (150%) and twice the program length (200%), further analyzed by race, ethnicity, gender, and Pell status. Also, IPEDS collects the number of students who transferred to other institutions.

Institutional characteristics data are the foundation of the entire IPEDS system. Data collected include student services, tuition and fees, affiliation, calendar structure, levels of awards, and types of programs offered.

The Student Financial Aid survey collects the count of students awarded different types of financial aid or military education benefits and the total amounts of aid awarded. The average dollar amount of aid awarded is then calculated. As required by the Higher Education Act, IPEDS also collects data to calculate average net price at each institution for two groups of undergraduates: those awarded grant aid and those awarded Title IV federal aid.

The National Student Clearinghouse (NSC)

NSC services help institutions meet their compliance, administrative, student access, accountability, and analytical needs. Additionally, most U.S. postsecondary institutions rely on the NSC's verification and reporting services with more specialized data and statistics available via their Student Tracker service. NSC regularly works with educational organizations, like the National Student Loan Data System (NSLDS) to ease the transfer of data which helps education finance providers reduce default rates for students.

The NSC works with institutions with various academic calendars. Institutions typically report all students enrolled in a term to NSC every 30 days⁷. Enrollment status information reported by institutions to the NSC is used to respond to Enrollment Roster inquiries created by the NSLDS, as required by federal compliance reporting requirements. Additionally, the NSC has data reporting agreements with the majority of private and FFELP loan servicers to report enrollment status updates for borrowers with accounts they service.

STUDENT INFORMATION SYSTEM (SIS)

The veteran education benefit certification process is complex for large institutions that offer non-standard enrollment terms, multiple student levels (undergraduate, graduate, professional, etc.) and a large array of scholarships and grants available to students. Further complications may arise by having multiple campus locations and variable policies and practice during the enrollment process. The nuances related to the compliance elements of the certification process, as imposed by the VA, presents further challenges for institutions to ensure accuracy with reporting, this includes:

1. Reporting course enrollment dates for non-standard terms
2. GI Bill® benefits cannot be used along with Federal Tuition Assistance for the same course
3. Scholarships that apply to tuition only must be accounted for in calculating the tuition to submit for certification
4. Credit hours must be distinguished between resident (face-to-face) and distinct (online, hybrid, etc.)
5. Credit hour distinction differs between undergraduate and graduate level students
6. Resident and distance credit hour designation may have subjective interpretation
7. Reporting subsequent changes in major, credit hours, and tuition to the VA
8. Tuition must be reported at the equivalent of in-state rate
9. The student's academic program of record in the SIS must exist in WEAMS
10. Some HEIs use dual certification process, which may be problematic if the student was certified where the time-status of the two certifications do not match

Below is a synopsis of how PeopleSoft and Banner are used in reporting enrollment or changes of enrollment information to the VA.

PeopleSoft

PeopleSoft has functionality for various reporting needs from academic and enrollment to co-curricular reporting. The tool provided to assist with reporting needs is called Consolidate Academic Statistics (SRPCCONP).

Consolidate Academic Statistics captures demographic and statistical information about students and enrollment (or co-curricular activities). The process allows students in multiple programs (Careers) with different term dates to be captured as one record for reporting purposes. It also allows for the capture of enrollment information for non-standard terms. In essence, a customization of calendars. The process captures the data in staging tables that then may be queried or used in delivered functionality or reports, such as the NSC report. The consolidation can be used for a multitude of reporting needs, i.e. internal campus enrollment calculation and external enrollment reporting, such as surveys or IPEDS. An added functionality of Consolidate Academic Statistics is that once run, students have an individual record of the data that was consolidated/created for them. This makes for a handy reference if needed.

In 2014, PeopleSoft released a Veterans Benefit module within the student records system. Designed to assist SCOs

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in reporting certifications of VA education benefits on behalf of students, it assists in tracking benefit used and aid in the calculation of net tuition and fees.

Schools not utilizing the Veterans Benefit module or that have not fully implemented the module must use various PeopleSoft screens to complete a student's enrollment certification. These screens include:

SIS Administrative Center:

- General Information – Student's information
- Academics – Program and plan of study
- Transfer Credit – Military and other institutional credit
- Academic 2 – Class schedule, advising records, academic advising record
- Financial Aid Screen – Verify Tuition based awards

SIS Student Financials:

- Global Account View – Tuition and fees
- View Custom Accounts – Verification of text fee

Access to this information may come in the way of individual look-ups, queries, or customized pages.

Ellucian Banner

Veteran reporting, baseline Banner offers a single form as part of the Learner Record screen for designating veteran information. In this screen, the SCO can enter the certification term, credits certified and the specific chapter designation. Beyond these data points, the screen does not hold other information. However, Banner has a feature called Supplemental Data Engine (SDE) that institutions may leverage to extend data collection beyond what is available in baseline Banner screens. Institutions seeking to leverage the SDE, should discuss it with the appropriate technical leads who oversee the student module.

For the task of reporting enrollment data or the outcome data to VA-Once, Banner does not offer an out-of-the-box solution where data is organized in an easy to consume format. The two data extracts that exists for enrollment and degree reporting are specifically for the NSC:

- Enrollment verification reporting to NSC (SFRENRL)
- NSC degree extract program (SHRDEGV)

However, those extracts serve to satisfy enrollment reporting to NLSDS for Title IV compliance. Neither extracts contain veteran indicators that would meet the needs of VA-Once.

A SCO would have to manually review and note data elements from multiple screens, make calculation, and possibly refer to external source for data that may not exist in Banner. Several screens where the SCO will reference the information for VA-Once reporting include:

- Enrollment status and registration (SFAREGS) for the student's academic program, campus, and residency rate (in-state, out of state, etc.)
- Registration Schedule (SFAREGQ) for student's schedule to build the enrollment periods for reporting to VA-Once.
- Learner record (SGASTDN) for the student's academic program, campus, certification information, and residency (in-state, out of state, etc.)

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- Customer service inquiry (TSAAREV) for calculating tuition, fees, billing, payment, and source of payment (scholarships, grants, etc.) for the reporting term
- Degree and Other Formal Award (SHADEGR) to determine if the student graduated
- General person identification (SPAIDEN) for the student's phone, email, address, VA File number and student's SSN
- Term course maintenance (SHAINST) to determine academic standing (probation, warning, dismissed, etc.)

Other options for the SCO is to work with the institution's computer services to create custom reports to assist with VA-Once reporting.

CURRENT CHALLENGES & OPPORTUNITIES WITH VETERAN REPORTING

The current VA reporting process requires manual data entry requiring increased staff for the institutions. The manual entry increases the likelihood of errors, delays, and oversight and reduces time that can be spent advising student veterans and their dependents. Users feel the VA-Once system for reporting enrollment data is antiquated both functionally and technically.

When it comes to reporting veteran graduation rates, the VA's system requires the student to be a GI Bill® recipient for the graduation term. As a result of this requirement, a university's graduation, or success rate in assisting veterans on their campuses, is not truly captured and is often under reported. This is a disservice to the veteran population as the VA reported data does not show the true success rates at universities. Moreover, the system measures one unit of graduation, which does not fit with varying institutions and the likeliness of students transferring from one institution to another.

Higher education institutions report enrollment data to the Department of Education via NSC or directly to NSLDS. The Dep. of Ed reports completion rates, but only for students receiving aid under Title IV. Furthermore, the interpretation of enrollment data reported to the Department of Education vastly differ from the VA.

As noted in a preceding section, the differences illustrated between the two student information systems exemplifies the complexities in deriving the data required for enrollment reporting and outcome reporting. The student information systems should be agile enough to allow managing the complexities of the veteran education benefits and varying classification of veterans. The limitations or the lack of functionality may force a higher education institution to implement a proprietary

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solution to manage veteran reporting. However, those proprietary solutions are not often portable to other institutions even if that institution is using the same SIS. Nonetheless, higher education institutions must report the required data to satisfy regulatory requirements and employ one of the following options:

- VA-Once – current process. The VA Once system requires manual entry and lacks the accuracy needed for reporting graduation rates. VA has not demonstrated the ability to update their system and a new VA system is a long-term strategy.
- SAM/VSA – This infrastructure is in place but utilization by institutions has been low. Currently, institutions would submit the cohorts, NSC would calculate the rates and share them with the institutions. With widespread support, it might create pressure for the VA to report different and more appropriate rates. This may be a good short-term solution.
- Many educational institutions calculate and publish their own graduation rates for the student veteran population. This is not likely to be considered an acceptable approach by the VA.

Opportunities for Improvement

Despite the challenges noted in prior sections, there exists opportunities for improving outcome reporting:

- Improved accuracy and speed of reporting by reducing/eliminating manual data entry
- Standards driven simplified process that reduces the need for training
- Consistently defined “veteran”, “transfer of entitlement” cohorts
- Deeper data analytics – address more completion types and outcomes
- More accurate and complete information to be housed on the GI Bill comparison tool with greater transparency
- Increased service to veterans - Veteran Service office can focus on higher order student needs, programming and retention rates
- Provides an option for schools desiring scalable and/or high-volume solutions
- Potential of aggregate and benchmark reporting

RECOMMENDATIONS

While enrollment reporting to VA is far more challenging given the nuances and regulatory mandates, the outcome data reporting is far simpler. The work group recommends a collaboration between the Department of Veteran Affairs and the National Student Clearinghouse (NSC). With over 97% of higher education institutions submitting enrollment and degree data to the NSC, it would seem logical and effective to leverage that process to fulfill the Veteran Affairs outcome reporting mandate.

This is a long-term solution where the VA would provide the cohort to NSC, NSC would calculate the rates according to the VA definitions and report the data to the VA. Educational institutions would continue the enrollment reporting they currently have in place. If desired, the data could be routed to the educational institutions for review by the SCO, before they are reported to the VA and potentially published. For those higher education institutions that do not leverage the Clearinghouse, they could consider doing so or report the outcome data directly to the VA.

The NSC currently works with the Department of Education and higher education institutions for Title IV reporting to the NSLDS. This partnership has resulted in more accurate enrollment rates and has proven to be incredibly effective for all parties, in regard to meeting Title IV reporting requirements. The VA could provide the NSC with a finder set to query on the VA benefit recipient population of interest. NSC could leverage the enrollment and degree data it maintains to report data necessary to calculate enrollment persistence, transfer, and completion rates.

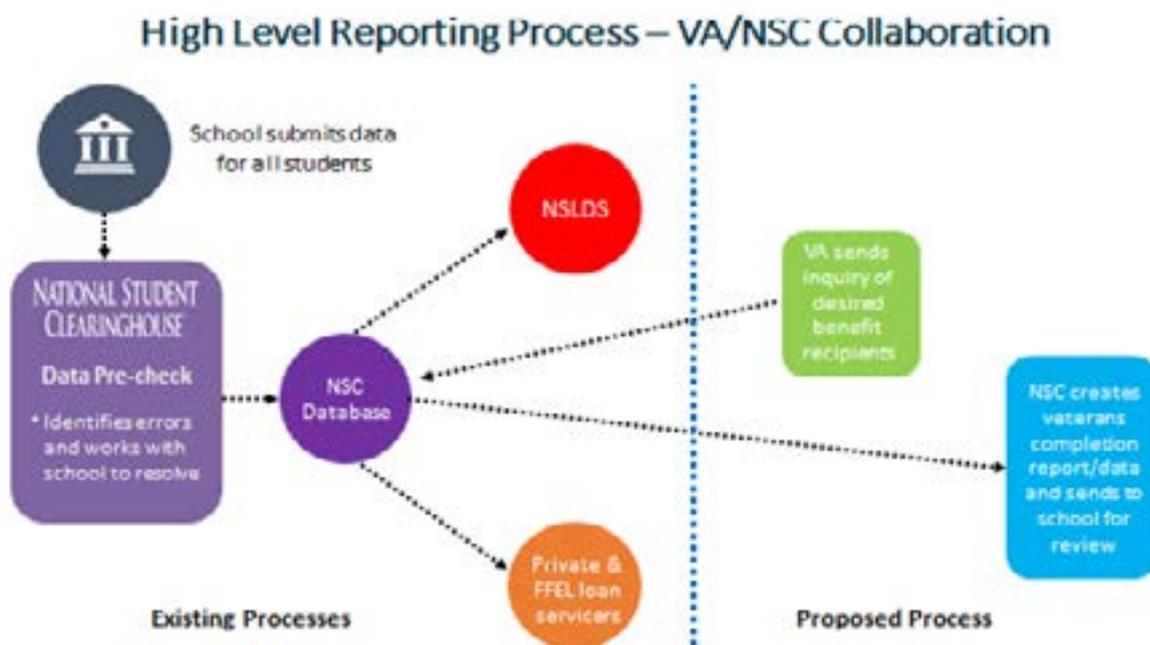


Image 1. A conceptual process for data reporting.

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The work group identified many benefits with this process:

- The benefits to leveraging current NSC reporting for outcome measurements allows for the following:
 - Reduces errors in reporting when data is extracted from SIS and verified through NSC error identification process
 - Student data being sent can be used for more effective completion and persistence reporting
 - With the VA creating the query file, identifying the population of benefit recipients, recipient type (veteran, service member, reservist, or dependent), and which VA education benefit the beneficiary is utilizing, data definitions for reporting purposes will be aligned across all institutions
- Willingness for NSC to work directly with VA for integration
- No further data is needed in addition to what is already reported to NSC for NSLDS requirements
- University and VA resources can be refocused on the student needs and more complex issues requiring manual review
- Can also provide a direct reporting option to VA for those not utilizing NSC for enrollment reporting which does not require NSC as service provider
- Consistent reporting from institutions leveraging NSC (following same reporting layout and guidelines)

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