

VBA EDUCATION SERVICE OVERSIGHT & ACCOUNTABILITY DIVISION



Standard Operating Procedure

Targeted Risk Based Review (TRBR)

**October 1, 2022
Version 3**

TARGETED RISK BASED REVIEW

Authorization: By the authority of the Deputy Director, Program Management, Education Service; Targeted Risk Based Review policies and procedures will comply with this document. Recommendations for changes or improvements to this document should be forwarded to the Office of the Assistant Director, Oversight and Accountability Division.

Deputy Director
Program Management
Education Service

TRBR Revision Changes		
Version #	Date of Change	Remarks
1.0	1/4/2018	Initial TRBR guidance established
2.0	10/17/2018	Revised TRBR to update with current O/A Strategy
2.1	3/1/2022	Updated & Revised
2.2	8/11/2022	Updated & Revised
3.0	10/1/2022	SOP Update

TARGETED RISK BASED REVIEW

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TARGETED RISK BASED REVIEW

1. PURPOSE:

This document establishes procedures necessary to execute Targeted Risk Based Reviews (TRBR).¹

2. SCOPE:

Implement TRBR guidance to support safeguarding the integrity of the G.I. Bill and beneficiaries when reports of adverse education and training institution activities are received from various trusted sources. The objective is to enhance institution oversight and accountability to ensure G.I. Bill students achieve their educational objectives and propel them into their desired career field. The TRBR process includes the research, review, onsite visits, reporting, mitigation actions and enforcement actions.

3. APPLICABILITY:

This procedure applies to Education Service, Oversight and Accountability Division and State Approving Agencies (SAA), when assigned a TRBR.

4. OVERSIGHT AND ACCOUNTABILITY STRATEGY:

Utilizing a spectrum of available activities, protect the integrity of the program, conduct compliance activities, and exercise enforcement options as applicable.

5. DEFINITIONS:

Targeted Risk Based Review (TRBR): An unannounced onsite review conducted at education and training institutions due to notification of risk, receipt of an allegation of fraud, deceptive, advertising and/or other misleading practices.

TRBRs have four principal objectives:

- (1) Provide EDU VACO directed reviews for an Education and Training Institution (ETI) or a grouping of similar facility types when it has been identified to have a high risk for noncompliance with the Principles of Excellence and other statutory requirements;
- (2) Provide Education Service the capacity to assign an investigation to VA Office of Inspector General (OIG) in cases that have serious allegations;
- (3) Provide Education Service the capacity to complete reviews of an ETI based on the receipt of credible serious allegations;
- (4) Assure prompt action is taken through appropriate channels if allegations are substantiated with TRBR visit.

Compliance Surveys are conducted at institutions and training facilities in accordance with 38 USC § 3693 and are scheduled at the beginning of each fiscal year. The surveys are conducted to ensure that schools and training establishments, and their approved courses, are in compliance with all applicable provisions of the laws administered by VA. Compliance surveys have five key objectives:

¹ EO 13607 Establishing Principles of Excellence for Educational Institutions Serving Service members, Veterans, Spouses, and Other Family Members. President Barack Obama, 27 April 2012.

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1. To verify the propriety of payments of educational benefits to eligible individuals under the provisions of the laws administered by VA.
2. To confirm continued compliance with all approval criteria.
3. To assist school or training officials and eligible individuals in better understanding their responsibilities and the procedural requirements of VA.
4. To determine, based on facts disclosed from document reviews and personal visits, whether there are deviations from the responsibilities and requirements by eligible individuals, schools, or training establishments; and
5. To assure that action is promptly taken through appropriate channels for the correction of existing discrepancies, or for the discontinuance of benefits in the event correction is not accomplished.

Risk-Based Survey (RBS): An onsite review conducted at education and training institutions, institutions of higher learning and noncollege degree, to conduct compliance and mitigate risk factors and practices.

RBS has three principal objectives:

- (1) Provide a mechanism for VA and SAAs to review and mitigate potential fraud, waste, and abuse by utilizing data and risk factors that are outside of the normal approval, compliance, and liaison processes. The following are legislatively mandated risk factors. However, operating in a dynamic educational environment, additional risk factors are considered for a risk-based survey.
 - a. Rapid student population increase
 - b. Rapid tuition and fee payment increase
 - c. Volume of validated student complaints
 - d. Severity of validated student complaints
 - e. 85/15 rule violation
 - f. Veteran completion rates
 - g. Financial stability
 - h. Advertising and marketing
 - i. Federal or State government actions in court
- (2) To verify propriety of Chapter 33 payments of educational benefits to eligible institutions under the provisions of the laws administered by VA.
- (3) Assure prompt action is taken if risk factor(s) is substantiated.

6. TARGETED RISK BASED REVIEW PROCEDURES

Generally, TRBRs will be determined through analysis of all available data and/or information concerning a facility or groupings of similar facilities. Available facility data will be routinely analyzed to identify potential negative or positive trends and other factors. Analysis will include data reported from compliance survey results and Potential Risk Indicators (Appendix A), complaints received, and other publicly available information as appropriate. Examples of sources that initiate TRBR: (not all inclusive)

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- Complaint(s) received from the GI Bill® Feedback Tool
- Previous compliance activity data
- Management mandates
- Information received from other government agencies & regulators
- Enforcement actions by various law enforcement agencies
- Lawsuits against the institution
- Facility self-reported violations

6.1.COMPLAINT(S) RECEIVED

All complaints received through the GI Bill feedback system are analyzed by the VACO, G.I. Bill Integrity and Protection Branch. In instances where a serious allegation(s) is identified, a TRBR may be recommended.

TRBRs will be assigned to:

- VA, Oversight & Accountability Division - regarding enrollment certification procedures.
- SAA - regarding approval factors.

A TRBR is not a criminal investigation. Those conducting reviews are not authorized to present themselves as investigators under any circumstances. However, potential criminal practices or serious allegations will be shared through your supervisory chain to Education Service, Office of the Assistant Director, Oversight & Accountability.

If the complaint is discrimination based, the Office of the Assistant Director, Oversight and Accountability retains the authority to share the complaint with the Department of Education (ED). VA retains the responsibility to review all allegations and provide a response to findings.

6.2.PREVIOUS COMPLIANCE SURVEY DATA

Information received through the compliance survey reporting process will be analyzed frequently to identify trends and correlations which will be used to identify potential identifiers of risk. This data will be incorporated with information received through the GI Bill Feedback Tool or other venues where possible to strengthen data analysis.

Analysis of available data will be conducted on a quarterly basis. Analysis of previous compliance activity will include identifying Potential Risk Indicators (Appendix A) and any reported findings of failure to comply with the Principles of Excellence requirements (Appendix B).

MANAGEMENT MANDATE

The Assistant Director, Oversight and Accountability retains authority to direct a TRBR for any matter that encroaches upon the integrity of the GI Bill program.

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6.3. OTHER GOVERNMENT AGENCIES INFORMATION

Education Service may receive a referral from internal VA offices such as the OIG, other government agencies/regulators (i.e. Department of Justice (DOJ), Consumer Financial Protection Bureau (CFPB), Department of Defense (DOD), Department of Education (ED), etc.) and state/local law enforcement (e.g., state attorney generals). Referrals received from other federal agencies/regulators or other internal VA offices will be evaluated based on all data available for the facility in question to determine if a TRBR is required.

Education Service may also receive complaints from sources such as White House Hotline, institutional staff, accrediting agencies, or via the media or news reports. Complaints received from these sources will be managed as if received from other government agencies.

6.4. FACILITY SELF-REPORTED VIOLATIONS

There may be instances when an ETI self-reports a violation to the SAA or Education Service. When this occurs, the information received will be carefully evaluated to determine if a TRBR is appropriate.

7. FINAL RISK ASSESSMENT AND DETERMINATION PROCESS

When making final recommendations for a TRBR with one or more source from section 6 above and Potential Risk Indicators (Appendix A), the Oversight and Accountability team, comprised of division specialists led by the Chief, Approvals, Compliance, Liaison Branch, will consider the totality of the circumstances and make adjustments based on information available. Oversight and Accountability Team will also regularly update and review the list of risk indicators based on lessons learned and new trends in the landscape.

7.1 PREPARE FOR APPROVAL

Once an ETI is identified for a potential TRBR, the Oversight and Accountability team will submit the Initiating TRBR Recommendation Template (Appendix C) for approval.

An ETI or grouping of similar typed ETIs may be warranted especially if having been identified as non-compliant with POE and other potential risk indicators.

Once the TRBR is approved, the Oversight and Accountability team will create a TRBR schedule in Salesforce and a notification will be sent to the appropriate Chief Education Liaison Officer (CELO) to schedule and assign the compliance activity.

8 CONDUCTING TARGETED RISK BASED REVIEW

A TRBR will not be conducted in the same manner as a compliance survey. However, in certain instances, it may be determined that a partial compliance survey be conducted that focuses specifically on the risk(s) identified.

A TRBR will only be conducted on-site. No advance notification will be sent to the ETI. A team of no less than two personnel will participate in the on-site review. A lead for the team will be identified by the CELO.

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In all cases where a TRBR is directed, the Oversight and Accountability team may provide specific details of risk indicators identified prior. Emphasis will be placed on validating the identified risk indicators and determine if complaints are substantiated when conducting the assigned TRBR.

In preparation to the site visit, at a minimum, complete the following research and review:

- ETI location, hours of operation, school calendar, website, etc.
- WEAMS Details & Reports
- Recent approval and compliance documents available in Salesforce
- GI Bill® Comparison Tool and GI Bill® Feedback Tool
- Available advertising (i.e., website, social medial, YouTube, etc.)
- VA systems for ETI enrollments and payment data
- VA systems for student enrollment and payment data

8.1 Risk Indicators

The following are risk indicators for consideration:

- Withdrawal due to approval violations OR at the request of the ETI
- Threshold limit 85/15 Rule (38 CFR § 21.4201)
- Exceeding imposed enrollment limits
- Modality of program
- New legislation impacts
- Change in profit-status
- Request by an ETI to be withdrawn from the GI Bill program
- Type of facilities and trends
- Special programs (VRRAP, VET TEC, STEM)
- Increase in student enrollment
- Increase in tuition and fees
- Other themes identified by Education Service

8.2 MANDATORY AREAS OF REVIEW

The following are Risk Indicators by Program of Education (Appendix D):

- Restrictions on enrollment; percentage of students receiving financial support (38 CFR § 21.4201)
- Observation reports (i.e., are there any students, equipment, staff, etc.)
- Scholarships, grants, and other institutional aid
- Last Payer (38 USC § 3313)
- Outstanding or unpaid balance, efforts to collect, proof of payment
- Recruiting practices, lead generation, commissions, etc. (38 USC § 3696)
- Applicable sections of recent legislation impact
- Attendance records (if applicable)
- Special programs (VRRAP, VET TEC, STEM)

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8.3 REASSESS PRIORITY LEVEL

Prioritizing TRBRs ensures that the reviews with the highest risk are conducted in a timely manner. The authority to reassess a priority level resides exclusively with the Office of the Assistant Director, Oversight and Accountability.

9 CLOSURE OF TRBR

The results of a TRBR will be reported in Salesforce utilizing the VA 22-1934 and an Executive Summary that highlights the key elements of the visit - Recording TRBR (Appendix D).

The timeliness goal to complete a TRBR is 30 days from date of assignment. This timeframe may be increased based on unique details, findings, and referrals.

If the TRBR was generated from a complaint, the complaint remains open until the TRBR results are received and reviewed. The Executive Summary must identify one of the following findings: (a) The egregious allegation is substantiated; or (b) The egregious allegation is unsubstantiated.

9.1 SUBSTANTIATED

“Substantiated” means that a complaint or allegation was researched, and that credible evidence of the allegation exists the G.I. Bill Integrity and Protection Branch will be notified of the findings within 30 days of the TRBR request and should be provided updates through established reporting processes.

9.2 UNSUBSTANTIATED

“Unsubstantiated” means that a complaint or allegation was researched, and that credible evidence of the allegation does not exist. The G.I. Bill Integrity and Protection Branch will be notified of the results within 30 days of the TRBR request date. If the TRBR was generated from a complaint, the complaint will be closed once Oversight and Accountability receives the results.

9.3 REFERRALS

If a complaint is substantiated and referred, the G.I. Bill Integrity and Protection Branch will be provided updates and estimates of time of completion through established reporting processes. TRBRs can be referred to SAA, OIG, ELRs, RPOs, School Liability, or OGC. After the referral action has been completed, the Oversight and Accountability team should be notified of the results within 7 days. If a complaint generated the TRBR, the complaint will remain open until the G.I. Bill Integrity and Protection Branch receives the results.

10 REPORTING

The Oversight and Accountability team will prepare a monthly TRBR status report. This report will summarize the status of all TRBRs and provide assigned personnel the opportunity to elaborate on the status of the TRBR.

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10.1 TRBR STATUS REPORTS

- Monthly Active status TRBRs
- Monthly TRBR referral status report
- Annual TRBR status report (active, closed, etc.)
- Annual TRBR by State status report

10.2 TRBR ANALYSIS

Oversight and Accountability will prepare a monthly TRBR analysis with focus on the following:

- TRBRs assigned by primary risk indicator
- TRBRs assigned by source of risk indicator
- TRBRs assigned by Risk Indicators (Appendix A)
- TRBRs substantiated/unsubstantiated
- TRBRs referred to other trusted agencies
- TRBRs assigned to VA/SAA

11 TRBR FUTURE DEVELOPMENT

The Oversight and Accountability team is assigned as the project manager for all future TRBR Policy and Procedure updates.

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Appendix A: Potential Risk Indicators

VA Education, Oversight & Accountability practitioners and State Approving Agencies review internal documents and marketing materials, meet with school certifying officials, and interview current students. As a result, are on the front lines in identifying misleading and fraudulent practices by colleges, universities, and trade schools. This appendix highlights specific “risk indicators” of fraud that could be identified during a compliance survey.

Risk Indicators Related to Costs:

- Tuition/Fees information cannot be found on the website.
- Total cost of the program is not clear in marketing materials or on website.
- Marketing materials state that federal money, including GI Bill® funds, will cover the entire cost of the program.
- The school does not provide any refund when a GI Bill® recipient withdraws.
- Veterans are still taking out private loans even though the GI Bill® or federal financial aid is available.
- Significant numbers of veterans have withdrawn from their classes before the end of the term (especially right before the add/drop deadline).

Risk Indicators Related to Programs:

- The school is nationally accredited, rather than regionally accredited, but marketing materials do not make this distinction clear.
- School has told students that its programs are applying for regional accreditation (*e.g.*, making claims like “we are about to get accreditation”).
- Courses in fields of study that require hands-on training and/or licensing are overwhelmingly online.
- Marketing materials make claims that credits earned are easily transferable to other schools or programs.
- Marketing materials claim or suggest the school or program is endorsed by or affiliated with the military.

Risk Indicators Related to Statistics Posted:

- Job Placement rates seem high or over-the-top, *e.g.* “*Our graduates are recruited by all the Fortune 500 firms.*”
- Job Placement is guaranteed.
- Publicized graduation or completion rates seem high, *e.g.*, “*99% of veterans graduate.*”
- Graduation Rates for servicemembers seem very low and/or different than the rate identified in public materials.
- Claims about student loan repayment seem high.
- Claims about the length of time it takes to complete the program and graduate seem unrealistic.

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Risk Indicators from Student Interviews:

- Students identify a representation made about the program (either in marketing materials or by recruiters) that turned out to be false, *e.g.*, “The GI Bill® will cover everything.”

Miscellaneous Risk Indicators:

- Independent-sourced data is out of sync with marketing or enrollment materials.

Appendix B: List of Principles of Excellence Requirements

Educational institutions who receive funding from Federal Veteran's and military educational benefit programs are strongly encouraged to comply to provide the following information:

- Provide a personalized Financial Aid Shopping Sheet to help students understand the total cost of the educational program and to make an informed decision to include:
 - Tuition and fees
 - Amount of cost covered by Federal educational benefits
 - Type and amount of financial aid they may qualify for
 - Estimated student loan debt upon graduation
 - Information about student outcomes
 - Other information to facilitate comparison of aid packages offered by different educational institutions
- Inform individuals of the availability of Federal financial aid and have policies to alert potential eligibility prior to arranging private student loans or alternative financing programs;
- End fraudulent and unduly aggressive recruiting techniques as well as misrepresentation, incentive/bonus, and failure to meet State authorization requirements;
- Allow individuals to be readmitted to a program if they were temporarily unable to attend class or had to suspend studies due to service requirements, take additional steps to accommodate short absences due to service obligations provided that satisfactory academic progress was being made prior to suspending their studies;
- Agree to an institutional refund policy that is aligned with the refund of unearned student aid rules for Federal student aid when a student withdraws prior to course completion;
- Provide educational plans that detail all the requirements necessary to graduate and the expected timeline of completion; and
- Designate a point of contact for academic and financial advising (including access to disability counseling) to them with the successful completion of their studies and with their job search.

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Appendix C: Initiating TRBR Recommendation Template

A Targeted Risk-Based Review (TRBR) is assigned for the following location:

SCHOOL NAME

ADDRESS

CITY, STATE ZIP CODE

FAC#

This is a VACO directed TRBR and will be completed within the next 30 days. (Please advise your Chief if there are any issues in meeting these requirements.)

Received complaints against *Name of School* for *list issues*.

TRBR required areas of evaluation and response in Executive Summary:

- **Financial Documents:**
 - Review student business ledger accounts to ensure they were charged the correct T/F amount
 - Compare tuition and fees charged to non-veteran students to veteran students
- **Student Contact:**
 - Interview previous and current students regarding quality of education, instructors in the classroom and financial aid process. Some questions to include:
 - Do you feel you received a quality education?
 - Did you have any issues with financial aid? Please explain your financial aid experience.
- **Quality of Education and Instructors:**
 - Validation of current instructors and their qualifications
 - Review cleanliness of the building. Complainant and other students have complained about rodents at this school.
- **VA or SAA Additional Findings**
 - Based on review, report any additional items found.

If you have any questions, please contact VACO Approvals, Compliance and Liaison team at EDUOVERACCT.VBACO@va.gov

The following additional information was reviewed in the TRBR decision process:

Please review the recommendation below for Targeted risk-based review:

- School is not following its Academic Grading Policies or Standards of Progress
- School is not granting appropriate credit for prior training
- School has engaged in Fraudulent or Misleading or Deceptive Recruiting Practices
- School is improperly or inconsistently applying its Attendance Policy

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- School is engaging in Improper Billing/Payment Practices; including Veteran vs. Non-Veteran billing
- School is improperly or fraudulently submitting enrollment certifications
- School changed the student's Degree/Plan Requirements
- Specific Issues:
 - Refund Policies Not Aligned with Title IV
 - Quality of Instruction, Instructors, and Facilities
 - School does not use Financial Aid Shopping Sheets
 - School does not use or provide educational plans to all individuals using Federal military and Veterans benefits
 - School improperly arranging private student loans or alternative financing programs
 - School improperly enrolling students into new courses/programs prior to obtaining accreditation
 - School does not have/exercise a policy which readmits Servicemembers and/or reservists that were temporarily unable to attend class or have to suspend their studies due to service requirements
 - School does not have a designated point of contact for Veterans, Servicemembers and family members
- Other: _____

The following additional information is provided:

Education Program(s) Participation:

- VA – Principles of Excellence
- VA – Yellow Ribbon Program
- ED – Title IV
- ED – 8 Keys to Veterans' Success
- DoD – MOU

VA – GI Bill® Feedback Tool:

VA – WEAMS:

- Original Approval Date:
- Substantive Revision Date:
- Ancillary Revision Date:
- Enrollment Limit:
- Catalog Year:
- Date Last Compliance Survey conducted and findings:
- Remarks:

VA – Salesforce:

- Date Site Visit Began:
- Date Site Visit Completed:
- Visit Type:

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- Agency Assigned:
- Purpose of Survey:
- Date Survey Scheduled:
- # of Veterans Attending:
- Total # of Errors:
- Total # of Payment Errors:
- Sum of Underpayment
- Sum of Overpayment

VA – Veteran Student Population:

RCS059/0260-Education Trainees at Active Institutions – Month Year:

	CH30	CH31	CH32	903	CH33	CH35	1606	1607	TOTAL
VETERANS	0	0	0	0	0	0	0	0	0
SVC/PERSONS	0	0	0	0	0	0	0	0	0
DEPENDENTS	0	0	0	0	0	0	0	0	0
RESERVISTS	0	0	0	0	0	0	0	0	0
TOTALS	0	0	0	0	0	0	0	0	0

VAONCE:

PA&I Historical Cost and Count Report Data:

Other:

Department of Education Actions:
Program Review:
Financial Audit Document:

Accrediting Agency:
Accrediting Agency Actions:

Oversight and Accountability Team Review Procedures:

Review the incoming basic information for anything that identifies suspicious, deceptive, willful neglect, or malicious activity at a school receiving GI Bill® benefits.

VA Approval: In WEAMS, verify the address of the school, Date of Last Ancillary/Substantive Revision Date and the Date of the Last Compliance Survey conducted and findings. The Last Ancillary/Substantive Revision date is the last update on the school's record in WEAMS. In the Issues and Remarks section, verify if the institution is accredited, suspended, or withdrawn for any reason. Review WEAMS for any derogatory information about the institution and annotate the Compliance Survey date, cases reviewed, and discrepancies.

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Education Program(s) Participation: verify if the institution is an “8 Keys to Veterans Success” participant by visiting the website <https://www.ed.gov/veterans-and-military-families/8-keys-success-sites> and visit the DoD MOU website <https://www.dodmou.com/Home/InstitutionList> to verify the school’s participation in the DoD MOU program.

GI Bill® Feedback Tool: search for the School Name to find other complaints at that location.

Veteran Student Population: review the Comparison Tool, the Tableau Individual School report, and the Hines Report for Education Trainees at Active Institutions. To identify the total payments made to the school, review the Tableau Individual School report and the Comparison Tool.

Saving Review: Create a new folder on the Shared Drive under H:\ 223\223B AC&L\223B TRBR AOR\Cases-Pending and name folder after the school’s name and facility code. Example folder name ShoolABC-12345678. All workup documents must be stored in this location.

The TRBR SME will email the TRBR recommendation to the 223B AC&L Team Chief for review and approval.

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Appendix D: Risk Indicators by Program

Truck Driving

- Preadmission charges
 - Drug test
 - Physical exams
 - Background Check
 - Driving Record
- Fee waivers
- 85/15 violation
- Equipment availability
- Institutional loans or repayment plans
- Refund Policy
- Attendance policy
- Program length
- Entry Level Driver's Training – Required as part of program
- Comparable costs to other programs
- Leave of Absence

Diving (PADI Open Waters)

- Equipment cost
- Program length
- May require proof of health
- Fee waivers
- 85/15 violation
- Equipment availability

Cosmetology

- Preadmission
 - New student assessment exam
 - Preparatory courses pending assessment score
- Program length
- Fee/Tuition waivers
- 85/15 violation
- Institutional loans or repayment programs
- Accreditation status
- Refund policy
- Attendance policy
- Comparable costs to other programs
- Leave of Absence

Welding

- Exceeding enrollment limits established by the SAA
- Fee waivers
- 85/15 violation
- Equipment availability
- Excessive charges for consumable items and welding gear
- Leave of Absence

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Coding Boot Camp/Cyber Security

- Exceeding enrollment limits established by the SAA
- Modality of instruction
- Fee waivers
- 85/15 violation
- Equipment availability
- Instructor qualification
- Comparable costs to other programs
- Leave of Absence

Vocational Flight

- Preadmission
 - Medical clearance
 - FAA student pilot certificate
- Length of program
- Contracts with IHL
- 85/15 violation
- Not being a functioning NCD flight school and only participating in the IHL contract

Fitness

- Cardiopulmonary Resuscitation (CPR)
- Automated External Defibrillator (AED)

Emergency Medical Responder/Technician

- CPR certification
- Pass the cognitive examination
- Pass the psychomotor exam
- 85/15 violation
- Program length
- Comparable costs to other programs

Culinary

- Program length
- Equipment cost
- 85/15 violation
- Health requirements

Pet Grooming

- Program Length
- Fee Waivers
- 85/15 violation
- Equipment availability
- Comparable costs to other programs

Massage/Spa Therapy

- CPR certification

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- First Aid
- Fee Waivers
- 85/15 violation
- Equipment availability
- Comparable costs to other programs

Computer Certificate Training

- Program length
- Instructor qualification
- Fee waivers
- 85/15 violation
- Equipment availability
- Comparable costs to other programs

Licensed Practical Nurse (LPN) and Certified Nursing Assistant (CNA)

- Physical endurance
- Length of training
- Equipment cost
- Fee waivers
- 85/15 violation
- Equipment availability
- Comparable costs to other programs

Holistic/Alternative Health Training

- Length of training
- Quality of training
- Fee waivers
- 85/15 violation
- Equipment availability

Landscaping

- Length of training
- Addition equipment other than (Lawnmowers, string trimmer, leaf blower, and hedge trimmer)
- Background check
- Drug test

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Pharmacy Tech

- Background checks
- Fee waivers
- 85/15 violation
- Equipment availability
- Comparable costs to other programs

Non-Degree Medical

- Length of training
- Background check
- Drug testing
- 85/15 violation
- Equipment availability
- Instructor qualifications

Real Estate Licenses

- Application process and fees
- Background checks and fingerprinting

Heating and Air Conditioning

- Fee Waivers
- 85/15 violation
- Equipment availability

Casino (Gaming/Dealing) Training

- Background check
- Drug testing

Note: As these are all NCD programs, common risk factors include graduation/completion rate, job placement rate, and advertising (false and/or misleading).

Yellow Ribbon Schools

- ETIs with large endowment scholarships
- Fee waivers
- Non-Resident T&F waivers

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Appendix E: Recording Targeted Risk Based Review

A Targeted Risk Based Review is required to be conducted and completed within 30 days from the date assigned. The review should only focus on the subject(s) TRBR referral from the Office of the Assistant Director, Oversight and Accountability. The surveyor will record TRBR documents and 22-1934 data in Education Service's Salesforce module. An Executive Summary must include the following items listed below:

Targeted Risk Base Review Executive Summary

Name of School:

Facility Code:

Complaint Number (if required)

Reason for TRBR:

Date Request for TRBR Received:

Date Review Conducted:

Date Results Submitted:

1. **Summary of Complaint/Reason for TRBR:**

2. **How Many Records Reviewed:**

3. **Findings/Summary:**

4. **Did the TRBR have any areas substantiated on the specific TRBR Assignment (did any TRBR risk factor fail)? See the TRBR Assignment sheet.**

___YES ___NO

5. **Were any other actions taken for approval besides the actions on the TRBR Assignment? For example, violation of 85/15, instructor qualifications, catalog update, etc.?**

___YES ___NO

****Note: If you answered Yes for any of the above questions, the TRBR is SUBSTANTIATED.****

Surveyor Name:

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Appendix F: Glossary of Terms

Risk Indicator is an indicator of risk that an institution(s) may be at considerable risk of violating a Principles of Excellence requirement.

Office of the Assistant Director, Oversight and Accountability VACO division which provides Education Services strategy for all compliance actions focused on safeguarding the integrity of the GI Bill.

Regional Processing Offices (RPO) Two regional offices that support the processing of education claims, and completion of any referrals submitted by the Oversight & Accountability Division and SAA upon completion of any compliance actions.

State Approving Agencies (SAA) State employees that support VA in completing approval, compliance, and liaison actions for schools eligible to receive GI Bill® Benefits.