



**SOUTH CAROLINA**  
COMMISSION ON HIGHER EDUCATION

Agenda Item 6.03.E  
CHE Meeting

August 1, 2019

**Memorandum**

**TO:** Chairman Wes Hayes and Members, SC Commission on Higher Education

**From:** Chair Paul Batson, and Members, Committee on Access & Equity and Student Services

**SC State Approving Agency (SAA) Overview**

**Introduction:** The South Carolina Commission on Higher Education Veterans' Education and Training Section is designated as the State Approving Agency (SAA), by the Governor. The SAA is a part of the National Association of State Approving Agencies (NASAA), which is comprised of state agencies that have the responsibility for approval and training available through the GI Bill. The SAA acts on behalf of the federal government to evaluate educational/vocational institutions and training establishments.

**Overview:** In accordance with Title 38 Code of Federal Regulations (CFR), 21.4253, 21.4254, 21.4261, and 21.4262, the SAA is responsible for reviewing, approving, revising, disapproving and monitoring all education programs at the colleges, universities, schools, apprenticeship and on-the-job training establishments within South Carolina. Moreover, in cooperation with the Department of Veterans Affairs (DVA), the SAA assists veterans and those eligible with school/employment programs and GI Bill benefit information. The SAA further assists the DVA with conducting compliance surveys at educational institutions and training establishments to ensure financial and enrollment certifications are met in accordance with the DVA's Education Services approval requirements.

Prior to the beginning of the DVA's Federal Fiscal Year (FFY), the SAA entered into a Contractual Agreement with the DVA Central Office. Effective October 1, 2018, the DVA's Contractual Agreement was replaced nationwide by the 2019 Cooperative Agreement. The DVA's Cooperative Agreement outlines the requirements that must be performed and completed by the SAA to receive a satisfactory performance rating from

the Joint Peer Review Group (JPRG). The JPRG is comprised of four DVA's Chief Education Liaison Representatives, and four SAA representatives. Each year, the JPRG convenes in the month of November to vote on the SAA's performance rating. Currently, there are three (3) ratings an SAA can achieve for their prior year's performance. The ratings are satisfactory, minimally satisfactory and unsatisfactory. South Carolina Commission on Higher Education SAA received a satisfactory rating for FFY 2018.

**Updates:** This update provides a three-year cycle comparison from the DVA's FFY 2017, 2018 and 2019 active facilities, program approvals, revisions, disapprovals, school tuition rates, the number of veterans, and those eligible receiving their GI Bill benefits at the educational institutions, the compliance surveys conducted that resulted in over and underpayments to the educational institutions, veterans, and those eligible to receive their GI Bill benefits. The update also provides top 10 South Carolina educational institutions with veterans and those eligible receiving GI Bill benefits enrollments for the selected month of April, for each year (2017, 2018 and 2019).

The rationale for selecting the month of April 2019 and going back three (3) years is because the latest data provided by the DVA is the financial report for the month of April 2019. The DVA and the SAA operate on a three (3) year cycle for auditing educational institutions and training establishments. Therefore, the month of April 2019, and collected data retroactively for the month and years of April 2017 and April 2018 provides a three (3) year cycle to coincide with the DVA's completed financial reports.

### **DVA's Educational Institution Terminologies:**

Institutions of Higher Learning (IHL) - Colleges and universities that offers post-secondary degree(s).

Non-College Degree (NCD) - Schools that offers post-secondary diplomas and certificates.

Apprenticeship (APP) - On-the-job training programs supervised by qualified employers that ranges from six (6) months and up to five years (5) in training time.

On-the-Job-Training (OJT) - Programs that are supervised by qualified employers that ranges from six (6) months and up to two (2) years in training time.

### **Active Educational Institution in Accordance with the DVA Active Facility Year:**

IHL, NCD, APP and OJT (educational institutions and employers/training establishments) are active when there are veterans and those eligible receiving their GI Bill benefits (payments), during the DVA's Active Facility Year. The DVA's Active Facility Year begins on May 1<sup>st</sup> through April 30<sup>th</sup>.

**DVA FFY 2017, 2018 and 2019 Active Educational Institutions and Training Establishments:**

2017 - **244**

IHL - 114  
NCD - 47  
APP - 6  
OJT - 77

**DVA FFY 2017, 2018 and 2019 Active Educational Institutions and Training Establishments Continued:**

2018 - **253**

IHL - 107  
NCD - 59  
APP - 74  
OJT - 13

2019 - **241**

IHL - 105  
NCD - 57  
Flight - 1  
APP - 17  
OJT - 61

**DVA FFY 2017, 2018 and 2019 Program Approvals at the Educational Institutions and Training Establishments:** All educational institutions are required to submit program approvals to the SAA staff for review and concurrence. The SAA staff reviews the program(s) for compliance in accordance with Title 38 CFR 21.4253, and 21.4254.

All training establishments are required to submit to the SAA new training program(s) that veterans and those eligible are seeking to use their GI Bill Educational benefits while employed by the establishment. The SAA staff reviews the request for new program(s) for compliance in accordance with Title 38 CFR 21.4261 and 21.4262.

2017

IHL - 3059  
NCD - 1166  
APP - 10  
OJT - 13

2018

IHL - 1942  
NCD - 761

APP) - 5  
OJT) - 10

**2019 As of April 30, 2019**

IHL - 1623  
NCD - 53  
APP - 0  
OJT - 6

**DVA FFY 2017, 2018 and 2019 Program Revisions at the Educational Institutions and Training Establishments:** All educational institutions are required to submit program revisions to the SAA staff for review and concurrence. The SAA staff reviews the program revision(s) for compliance in accordance with Title 38 CFR 21.4253, and 21.4254.

All training establishments are required to submit to the SAA revision(s) to their training program(s). The SAA staff reviews the request for program revision(s) for compliance in accordance with Title 38 CFR 21.4261 and 21.4262.

**2017**

IHL - 195  
NCD - 133  
APP - 9  
OJT - 33

**2018**

IHL - 251  
NCD - 121  
APP - 8  
OJT - 27

**2019 - As of April 30, 2019**

IHL - 125  
NCD - 41  
APP - 3  
OJT - 16

**DVA FFY 2017, 2018 and 2019 Program Disapprovals at the Educational Institutions and Training Establishments:** A program can be disapproved in several ways.

Below are the two most common program disapproval(s) from the educational institution and training establishments: 1) the educational institution and training establishments can notify the SAA and request for the program to be deleted/disapproved. If the program was initially approved by the SAA, all educational

institutions and training establishments are required to submit their deleted program(s) to the SAA for review and concurrence. The SAA's review and concurrence are to ensure veterans and those eligible receiving their GI Bill Educational benefits will not be affected by the decision to discontinue the program; and 2) the program does not meet the approval criteria in accordance with Title 38 CFR 21.4253, 21.4254, 21.4261 and 21.4262.

This will have an impact on the educational institutions and training establishments that are submitting new programs to the SAA for approval.

**DVA FFY 2017, 2018 and 2019 Program Disapprovals at the Educational Institutions and Training Establishments Continued:**

2017

IHL - 115  
NCD - 145  
APP - 0  
OJT - 0

2018

IHL - 159  
NCD - 56  
APP - 0  
OJT - 1

2019 **As of April 30, 2019**

IHL - 109  
NCD - 67  
APP - 0  
OJT - 0

**Post 9/11 GI Bill Public Institution Tuition 2017, 2018 and 2019 Rates:**

The DVA's Academic Year begins August 1<sup>st</sup> through July 31<sup>st</sup> of each calendar year. The 2017 tuition rate was \$22,805.34. The 2018 and current tuition rate is \$23,671.94. Beginning on August 1, 2019, the new tuition rate will be \$24,476.79. This is an increase of 3.2%. In addition to the tuition rate increase, veterans and those eligible will also receive a supplies/book stipend up to \$1,000.00 proportionately (\$500.00 for the fall and spring terms), in accordance with the current academic year.

**South Carolina Veterans Selected Reserves and Dependents Receiving their GI Bill benefits for the Months of April 2017, 2018 and 2019:**

2017 - 11,758  
2018 - 11,513  
2019 - 11,004

**DVA FFY 2017, 2018 and 2019 Compliance Surveys Conducted at the Educational Institutions and Training Establishments:**

2017 - **38** Compliance Surveys

IHL - 12  
NCD - 10  
APP - 7  
OJT - 9

**DVA FFY 2017, 2018 and 2019 Compliance Surveys Conducted at the Educational Institutions and Training Establishments Continued:**

2018 - **37** Compliance Surveys

IHL - 23  
NCD - 9  
APP - 1  
OJT - 4

2019 - **31** Compliance Surveys

IHL - 19  
NCD) - 6  
APP - 1  
OJT - 5

**DVA FFY 2017, 2018 and 2019 Compliance Surveys Financial Overview for the Educational Institutions and Veterans:**

**2017** - Educational institution over and underpayments

IHL and NCD overpayments - **\$23,059.29**

IHL and NCD underpayments - \$0

Veterans

overpayments - **\$20,427.29**

underpayments - \$1,100.28

**2018** - Educational institution over and underpayments

IHL and NCD overpayments - **\$19,182.17**

IHL and NCD underpayments - \$0

Veterans

overpayments - **\$24,304.41**

underpayments - \$171.49

**2019** - Educational institution over and underpayments

IHL and NCD overpayments - **\$19,267.42**  
IHL and NCD underpayments \$3,127.00

Veterans  
overpayments - **\$5,312.93**  
underpayments - \$4,025.95

**Noted in alphabetical order, the Top 10 Educational Institution with Veterans and Those Eligible Enrollments receiving GI Bill Benefits for the Month and Years of April 2017, 2018 and 2019:**

Educational Institutions	Veteran Population receiving GI Bill Benefits		
	<b>2017</b>	<b>2018</b>	<b>2019</b>
1 Charleston Southern University	468	428	440
2 Clemson	536	540	554
3 Coastal Carolina	472	485	461
4 College of Charleston	401	441	388
5 Greenville Technical College	414	403	366
6 Horry-Georgetown Technical College	337	310	302
7 Midlands Technical College	771	729	719
8 The Citadel	541	528	590
9 Trident Technical College	937	1478	1186
10 USC Columbia	1042	1079	1087

## **Introduction:**

- South Carolina Commission on Higher Education State Approving Agency's (SAA), overview in accordance with the FY 2019 Department of Veterans Affairs Cooperative Agreement.



## **SAA Overview:**

- The South Carolina Commission on Higher Education Veterans' Education and Training Section is designated as the SAA by the Governor.
- The SAA is a part of the National Association of State Approving Agencies (NASAA), which is comprised of state agencies that have responsibility for the approval and training available through the GI Bill. The SAA acts on behalf of the federal government to evaluate educational/vocational institutions and training establishments.

## **SAA Overview Continued:**

- In accordance with Title 38 Code of Federal Regulations (CFR), 21.4253, 21.4254, 21.4261, and 21.4262, the South Carolina SAA is responsible for reviewing, approving, disapproving and monitoring all education programs (colleges, universities, schools, apprenticeship and on-the-job training establishments), within South Carolina.
- Moreover, in cooperation with the Department of Veterans Affairs (DVA), the SAA assist veterans and those eligible with school/employment programs and GI Bill benefit information. The SAA also assists the DVA with conducting compliance surveys at educational institutions and training establishments to ensure financial and enrollment certifications are met in accordance with the approval requirements.

## **SAA Overview Continued:**

- Prior to the beginning of the DVA's Federal Fiscal Year (FFY), the SAA enters into a contractual agreement with the DVA Central Office. Effective October 1, 2018, the DVA's Contract was replaced by the 2019 Cooperative Agreement. The DVA's Cooperative Agreement outlines the requirements that must be performed and completed by the SAA to receive a satisfactory performance rating from the Joint Peer Review Group (JPRG).
- The JPRG is comprised of four DVA's Chief Education Liaison Representatives, and four SAA representatives. Each year, the JPRG convenes in the month of November to vote on the SAA's performance rating. Currently, there are three (3) ratings an SAA can achieve for their prior year's performance. The ratings are satisfactory, minimally satisfactory and unsatisfactory. South Carolina Commission on Higher Education SAA received a Satisfactory rating for the FFY 2018.

## **SAA Updates:**

- A three-year cycle comparison from the DVA's FFY 2017, 2018 and 2019 active facilities, program approvals, revisions, disapprovals, school tuition rates, the number of veterans, and those eligible receiving their GI Bill benefits at the educational institutions, the compliance surveys conducted that resulted in an over and underpayments to the educational institutions, veterans, and those eligible to receive their GI Bill benefits.
- The top 10 educational institutions with veterans and those eligible receiving GI Bill benefits enrollments for the selected month of April, for each year of 2017, 2018 and 2019.

## **Rationale for Selecting the Month of April 2019 & Retroactive for Three (3) Years**

- The rationale for selecting the month of April 2019 and going back three (3) years is because the latest data provided by the DVA is the financial report for the month of April 2019.
- The DVA and the SAA operate on a three (3) year cycle for auditing educational institutions and training establishments.
- Therefore, the month of April 2019, and collected data retroactively for the month and years of April 2017 and April 2018 provides a three (3) year cycle to coincide with the DVA's completed financial reports.

# DVA's Educational Institution Terminologies:

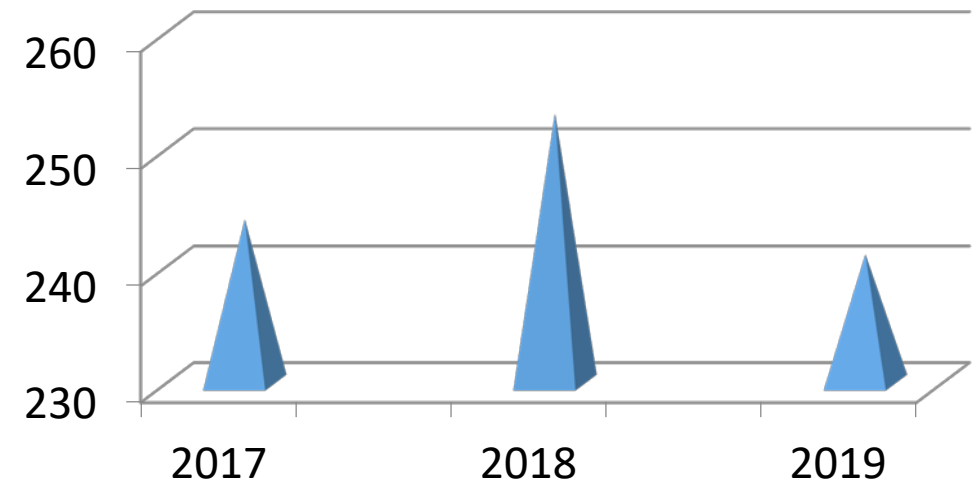
- Institutions of higher learning (IHL) - colleges and universities that offers post-secondary degree(s)
- Non-college degree (NCD) - schools that offers post-secondary diplomas and certificates
- Apprenticeship (APP) - on-the-job training programs that are supervised by qualified employers that ranges from six (6) months and up to five years (5) in training time.
- On-the-Job-Training (OJT) - programs that are supervised by qualified employers that ranges from six (6) months and up to two (2) years in training time.

## DVA FFY 2017, 2018 and 2019 Active Educational Institutions and Training Establishments:

- IHL, NCD, APP and OJT (educational institutions and employers/training establishments) will be active when there are veterans and those eligible receiving their GI Bill benefits (payments), during the DVA's Active Facility Year.
- The DVA's Active Facility Year begins on May 1<sup>st</sup> through April 30<sup>th</sup>.

# DVA Federal Fiscal Year (FFY), 2017, 2018 and 2019 Active Educational Institutions and Training Establishments:

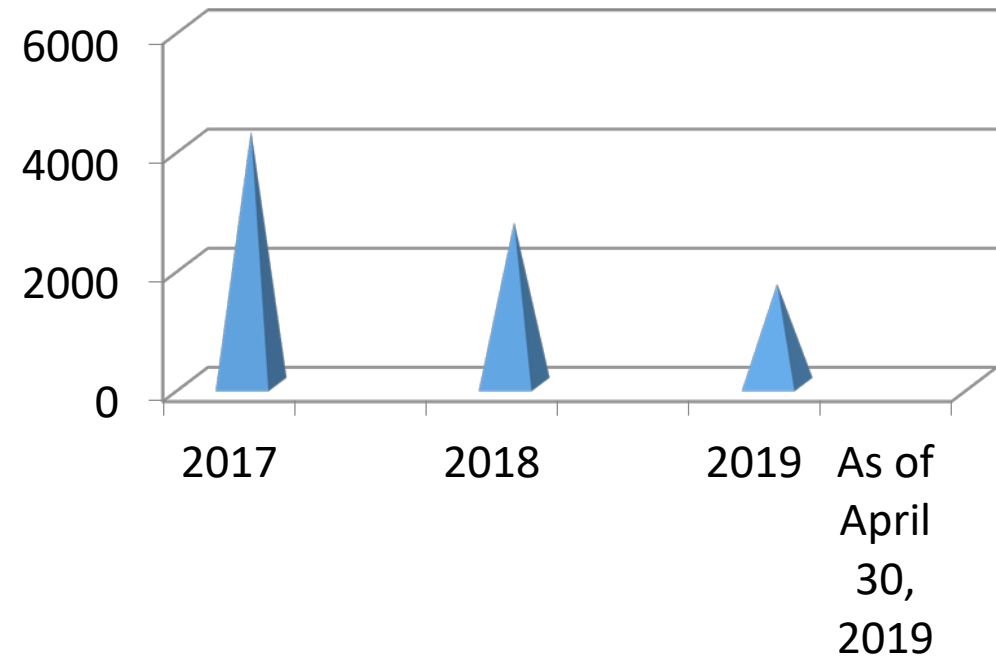
2017 -244	2018 -253	2019 -241
IHI -114	IHL-107	IHL-105
NCD -47	NCD -59	NCD -57
APP - 6	APP - 74	Flight -1
OJT-77	OJT - 13	APP -17
Total - 244	Total - 253	OJT - 61
		Total -241





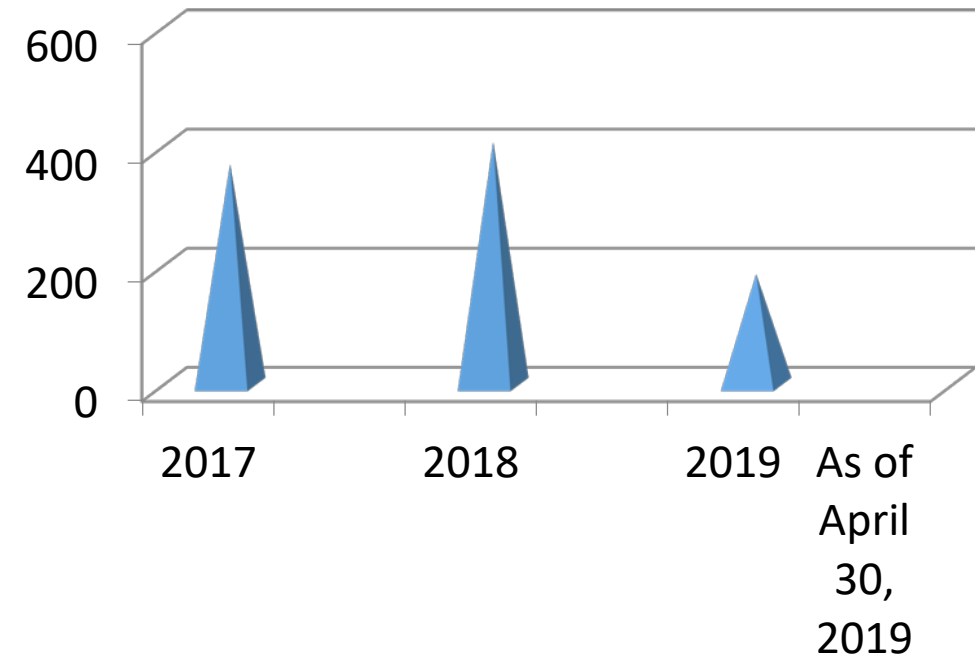
# DVA FFY 2017, 2018 and 2019 Program Approvals at the Educational Institutions and Training Establishments:

2017 -4248	2018 -2718	2019 -1682
IHI -3059	IHL-1942	IHL-1623
NCD -1166	NCD -761	NCD - 53
APP - 10	APP - 5	APP - 0
OJT-13	OJT - 10	OJT - 6
Total - 4248	Total - 2718	Total - 1682



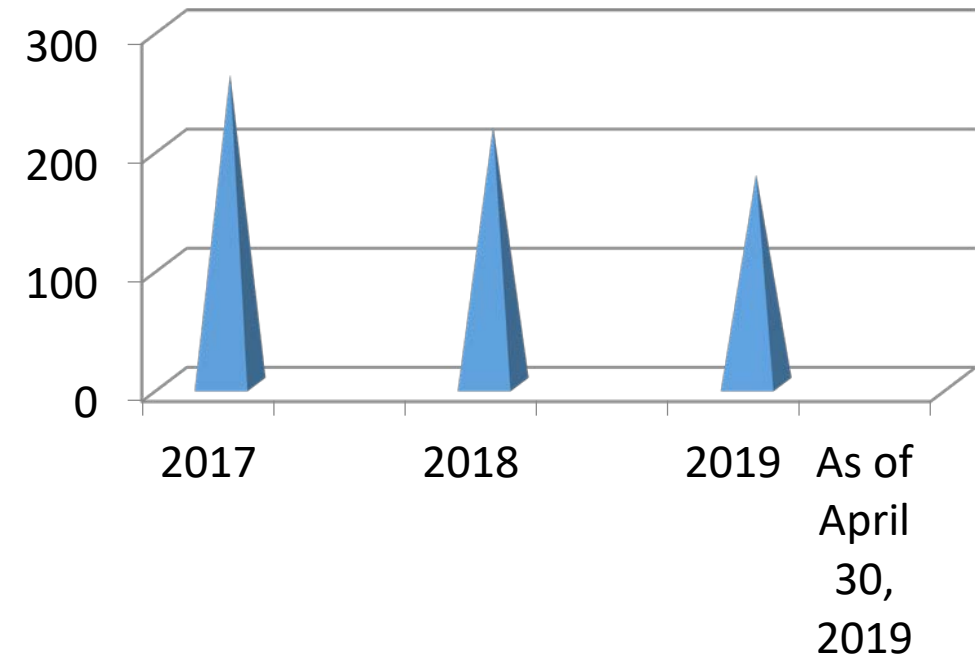
# DVA FFY 2017, 2018 and 2019 Program Revisions at the Educational Institutions and Training Establishments:

2017 - 370	2018 - 407	2019 - 185
IHI - 195	IHL-251	IHL-125
NCD -133	NCD -121	NCD -41
APP - 9	APP - 8	APP -3
OJT-33	OJT - 27	OJT -16
Total - 370	Total - 407	Total - 185

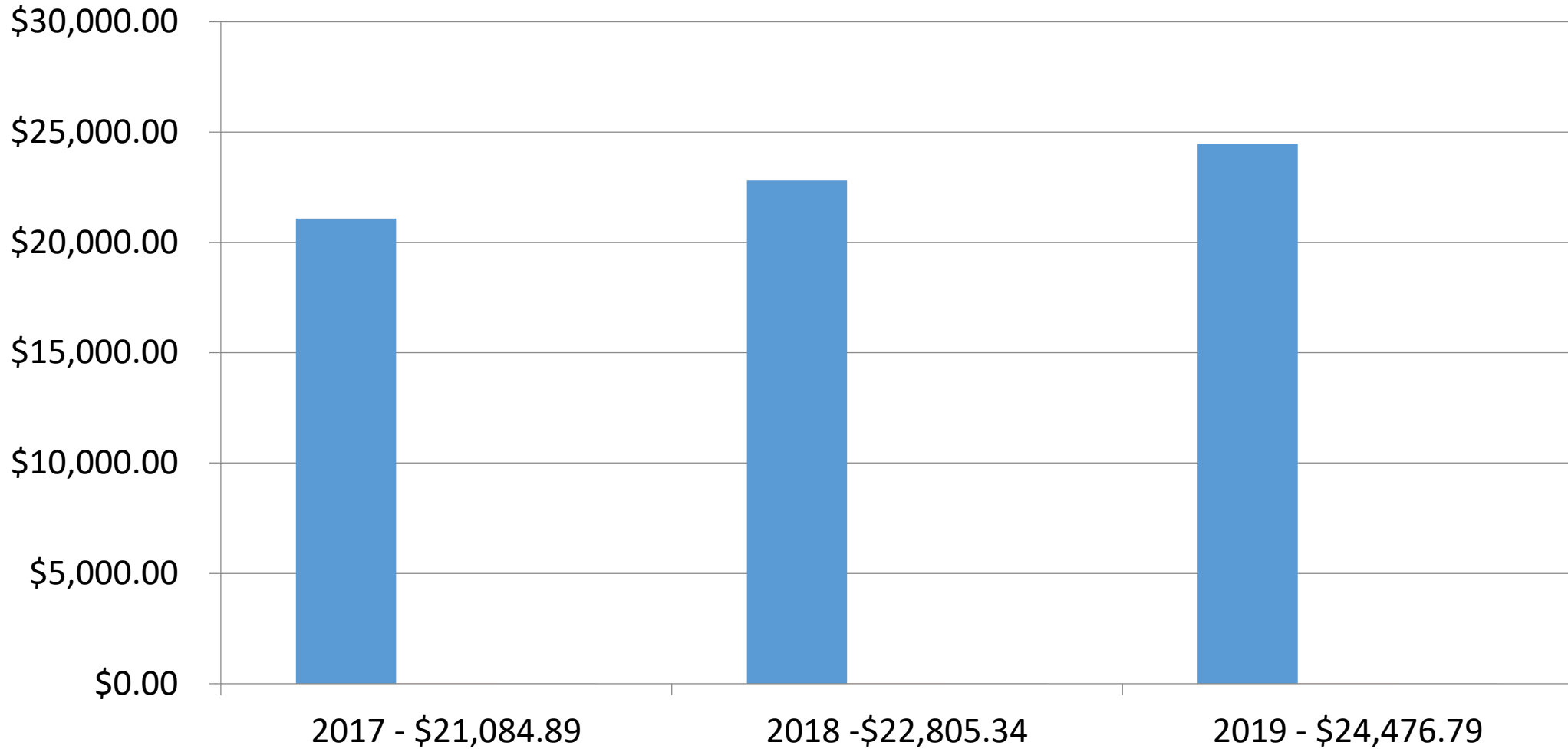


# DVA FFY 2017, 2018 and 2019 Program Disapprovals at the Educational Institutions and Training Establishments:

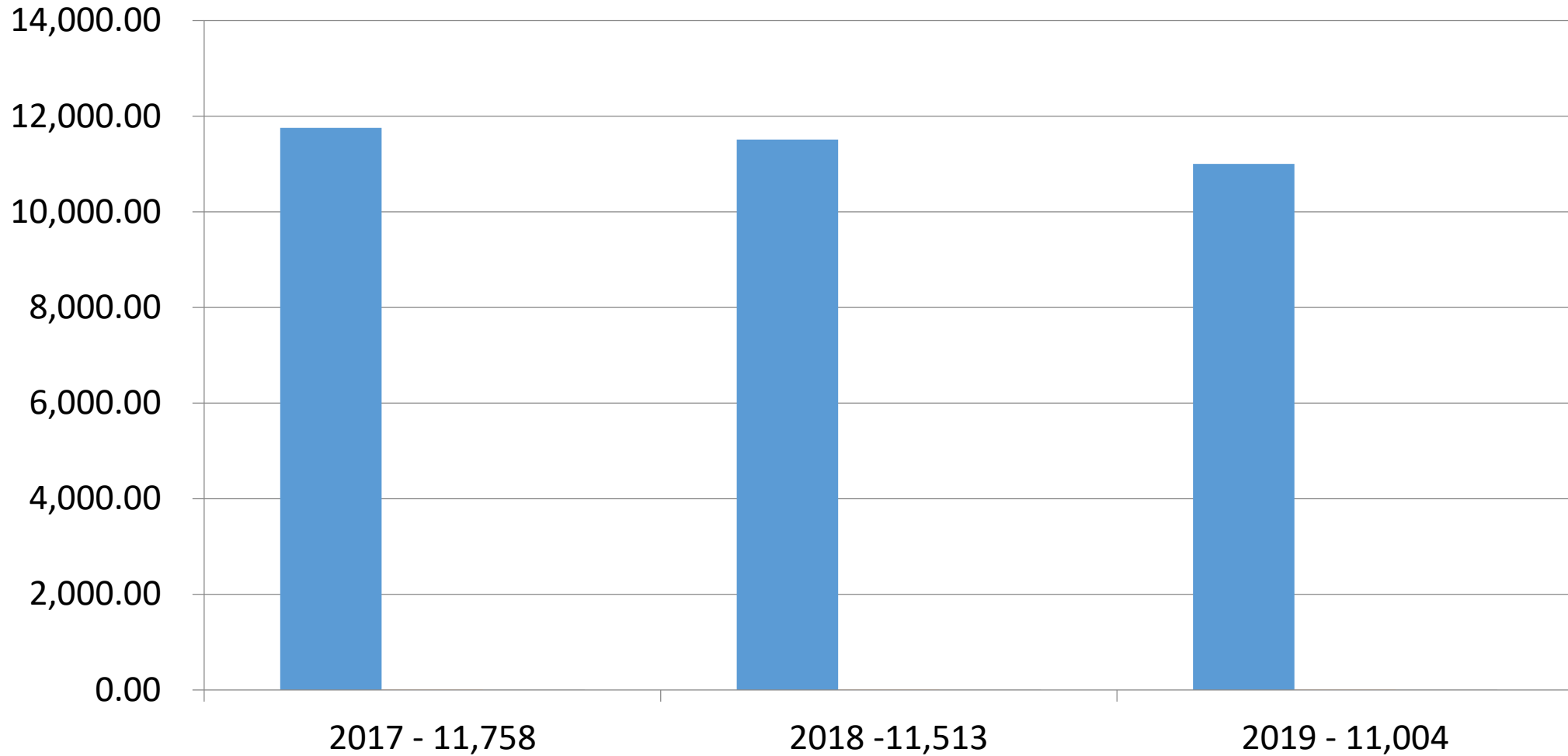
2017 - 260	2018 - 216	2019 - 176
IHI - 115	IHL -159	IHL-109
NCD -145	NCD -56	NCD - 67
APP - 0	APP - 0	APP - 0
OJT-0	OJT - 1	OJT - 0
Total - 260	Total - 216	Total - 176



# Department of Veterans - Post 9/11 GI Bill Tuition Rates for the Academic Years - 2017, 2018 and 2019



# South Carolina Veterans, Selected Reserves and Dependents Receiving GI Bill Benefits for 2017, 2018 and 2019



## DVA FFY 2017, 2018 and 2019 Compliance Surveys Conducted at the Educational Institutions and Training Establishments:

2017		2018		2019	
IHL	12	IHL	23	IHL	19
NCD	10	NCD	9	NCD	6
APP	7	APP	1	APP	1
OJT	9	OJT	4	OJT	5
Total	38	Total	37	Total	31

# DVA FFY 2017, 2018 and 2019 Compliance Surveys Financial Overview for the Educational Institutions:

2017		2018		2019	
<b>Overpayments</b>		<b>Overpayments</b>		<b>Overpayments</b>	
Educational Institutions	<b>\$23,059.29</b>	Educational Institutions	<b>\$19,182.17</b>	Educational Institutions	<b>\$19,267.42</b>
2017		2018		2019	
<b>Underpayments</b>		<b>Underpayments</b>		<b>Underpayments</b>	
Educational Institutions	\$0.00	Educational Institutions	\$0.00	Educational Institutions	<b>\$3,127.00</b>

# DVA FFY 2017, 2018 and 2019 Compliance Surveys Financial Overview for Veterans and Those Eligible to receive their GI Bill Educational Benefits:

2017		2018		2019	
Overpayments		Overpayments		Overpayments	
Veterans & those eligible	<b>\$20,427.29</b>	Veterans & those eligible	<b>\$19,182.17</b>	Veterans & those eligible	<b>\$19,267.42</b>
2017		2018		2019	
Underpayments		Underpayments		Underpayments	
Veterans & those eligible	<b>\$1,100.28</b>	Veterans & those eligible	<b>\$171.49</b>	Veterans & those eligible	<b>\$4,025.95</b>



## South Carolina's Top 10 Educational Institution with Veterans and Those Eligible Enrollments receiving GI Bill Benefits for the Month and Years of April 2017, 2018 and 2019:

	Educational Institutions	Veteran Population receiving GI Bill Benefits		
		2017	2018	2019
1	Charleston Southern University	468	428	440
2	Clemson	536	540	554
3	Coastal Carolina	472	485	461
4	College of Charleston	401	441	388
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# QUESTIONS

