

STATEMENT BY
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REGARDING
MILITARY'S TUITION ASSISTANCE PROGRAM
BEFORE THE
FEDERAL FINANCIAL MANAGEMENT, GOVERNMENT INFORMATION,
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Servicemembers Opportunity Colleges (SOC) is a DoD contractor supporting government-sponsored education to servicemembers. SOC is funded by DoD through a contract with the American Association of State Colleges and Universities (AASCU) and managed for DoD by the Defense Activity for Non-Traditional Education Support (DANTES). The statements and opinions expressed in this testimony are those of its author and do not necessarily reflect the views or policies of DoD.

Chairman Carper and distinguished members of the Homeland Security and Governmental Affairs Subcommittee on Federal Financial Management, Government Information, Federal Services, and International Security, thank you for the opportunity to discuss the management of the Department of Defense's (DoD) Voluntary Education Tuition Assistance Program.

It is DoD policy, defined by the Department of Defense's Directive 1322.08E, that members of the Armed Forces serving on active duty or actively drilling members of the Reserve Component shall be afforded the opportunity to complete their high school education, earn an equivalency diploma, improve their academic skills or level of literacy, enroll in vocational and technical colleges, and enroll in postsecondary education programs that lead to undergraduate and graduate degrees. Further, the costs of servicemembers participating in these Voluntary Education program are authorized by law to be funded by the tuition assistance program administered uniformly across the Military Services.

SOC's primary role in supporting the Department of Defense's Voluntary Education Program, defined in our Department of Defense contractual statement of work, is verifying that institutions that provide undergraduate educational programs on military installations are appropriately accredited, agree to adhere to academic principles and criteria regarding the transferability of credit and the awarding of credit for military training and experience, and have academic policies that facilitate completion of an academic degree or credential by servicemembers.

Built into the SOC Principles and Criteria are initial conditions for SOC Consortium membership that include: degree-granting authority by an institutional accrediting agency recognized by the Department of Education and/or Council for Higher Education Accreditation (CHEA), institutional approval by state approving agencies to receive VA education benefits, and meeting U.S. Department of Education student loan default guidelines.

Beginning in 2005, the SOC Principles and Criteria were expanded to include Operating Guidelines for member institutions related to college recruiting, marketing, and student services. The guidelines evolved into Standards of Good Practice for SOC Consortium institutions that are formally attached to the Principles and Criteria to which SOC Consortium members biannually affirm their compliance. New members pledge adherence when they become part of the SOC Consortium.

Participating academic institutions agree that their outreach efforts to servicemembers employ advertising and recruiting practices that focus on the educational programs and services available, accurately depict requisite knowledge and skill sets needed to succeed in these educational programs, and list all costs and conditions required for admission and enrollment. Our Standards of Good Practice also state that high-pressure promotional activities or enrollment incentives are inappropriate recruiting practices by our members.

With the increased funding levels in recent years that DoD Tuition Assistance and Veterans Affairs GI Bill programs contribute toward servicemembers'/veterans' education, some institutions have focused their recruiting and enrollment efforts on military student populations funded by federal government agencies. Given the volatility of the stock, banking, and housing markets, some institutions have sought to limit their capital risk potential by heavily recruiting students supported by guaranteed federal monies (e.g., federal Title IV financial aid, Tuition Assistance, and Veterans Affairs education benefits) to reduce the risk of enrolling students solely reliant on these personal funding sources which fluctuate with the economic downturns. A focus on advertising and recruiting students to "start" college without regard to student success metrics is where potential abuse of the DoD Tuition Assistance program may lie.

In the revised policy DoD Instruction, 1322, DoD Memorandum of Understanding (Appendix A to Part 68), a signed agreement with all institutions who participate in the DoD TA program, schools are required to affirm their commitment to adhere to the SOC Principles and Criteria and our Military Student Bill of Rights as a condition for program eligibility. Institutional adherence to the SOC Principles and Criteria and Military Student Bill of Rights will be monitored by a DoD compliance program managed by DANTES. With these added measures to document, identify, and continuously track adherence to SOC Principles and Criteria and the Standards of Good Practice, greater emphasis will be focused on compliance and elimination of any abusive enrollment practices in the Voluntary Education Program.

SOC's services contract with DoD identifies a second role related to college/university compliance with standards of good practice: serving as an academic forum for "academic counseling and troubleshooting." One of SOC's contract requirements is to research, problem-solve, and resolve (where possible) military student issues or grievances with SOC Consortium member institutions as

well as concerns brought to SOC by Education Services personnel and third parties. In this capacity, SOC staff research, document, and serve as ombudsmen for individual students or the military services to resolve alleged academic grievances or complaints with the specific college cited. In cases where there is no successful resolution to the problem or issue, SOC forwards the complaint/issue to other agencies: DoD Voluntary Education Inter-service Working Group, Department of Education, and/or the appropriate institutional accrediting agency.

With respect to improving fraud prevention in the DoD TA program, my recommendation would be more frequent and systematic analysis of student enrollment data for TA users. Historically, the accountability measures and account analysis employed by the military services have focused on micro-level data, i.e., whether federal monies funding an individual servicemember's educational endeavor needed to be repaid in cases where the military student did not successfully pass/complete the courses in which they enrolled using federal funding. The DoD could extend this analysis to examine course completion and TA usage data on the institutional level as well as the individual servicemember level. Systematically reviewing course completion rates—to include withdrawal for other than military/ deployment reasons, course failures, incomplete grades, or no grade reported—of TA usage by receiving institutions may prove useful. Collecting and aggregating such data across the Armed Services would also be useful for all tuition programs. Replicating similar data analyses for institutions receiving VA educational benefits might assist the federal government's overall financial accountability efforts. Since some servicemembers top up their tuition assistance funding with VA education benefits, it is likely that similar advertising and marketing strategies will be employed by institutions in both these military student markets.

SERVICEMEMBERS OPPORTUNITY COLLEGES SOC PRINCIPLES AND CRITERIA 2011-2013

Servicemembers Opportunity College (SOC), co-sponsored by the American Association of State Colleges and Universities (AASCU) and the American Association of Community Colleges (AACCC), functions in cooperation with 14 other higher education associations, the Department of Defense, Active and Reserve Components of the military Services, and the Department of Veterans Affairs to expand and improve voluntary postsecondary education opportunities for servicemembers worldwide.

The SOC Consortium, comprised of more than 1,900 college and university members, enrolls hundreds of thousands of servicemembers, their family members, and veterans annually in associate, bachelor, and graduate-level degree programs on school campuses, military installations, armories within the United States and overseas, and through distance learning and learning assessment. These voluntary programs are a significant joint venture and require strong commitment and coordination among academic institutions and agencies, the military Services including the National Guard, the Coast Guard, and the Office of the Secretary of Defense (OSD).

SOC is a vehicle to help coordinate voluntary postsecondary educational opportunities for servicemembers. SOC does this by:

- seeking to stimulate and help the higher education community understand and respond to special needs of servicemembers;
- advocating the flexibility needed to improve access to and availability of educational programs for servicemembers;
- helping the military Services including the National Guard and the Coast Guard, understand the resources, limits, and requirements of higher education;
- helping the higher education community understand the resources, limits, and requirements of the military Services including the National Guard and the Coast Guard; and
- seeking to strengthen liaison and working relationships among military and higher education representatives.

SOC PRINCIPLES

To achieve its goals, SOC is founded on principles agreed to collectively by the higher education community through the SOC Advisory Board, the Office of the Secretary of Defense (OSD), and the military Services including the National Guard, and the Coast Guard.

SOC Principles are predicated upon such principles as those set forth in the *Joint Statement on the Transfer and Award of Credit* of the American Association of Collegiate Registrars and Admissions Officers (AACRAO), the American Council on Education (ACE), and the Council for Higher Education Accreditation (CHEA), and are drawn principally from the cumulative experience of educational institutions and agencies judged successful in their work with servicemembers. The Principles embody a needed institutional flexibility with thoughtful development of programs and procedures appropriate to the needs of servicemembers, yet recognize the necessity to protect and assure the quality of educational programs.

Principle 1. In order to enhance their military effectiveness and to achieve their educational, vocational, and career goals, servicemembers should share in the postsecondary educational

opportunities available to other citizens.

Principle 2. Educational programs for servicemembers should rely primarily on programs, courses, and services provided by appropriately accredited institutions and organizations, including high schools, postsecondary vocational and technical schools, colleges, and universities.

Principle 3. To enhance access to undergraduate educational opportunities for servicemembers, institutions should maintain a necessary flexibility of programs and procedures, particularly in admissions, credit transfer, and recognition of other applicable learning, including that gained in the military; in scheduling and format of courses; and in academic residency requirements to offset servicemembers' mobility, isolation from campuses, and part-time student status.

SOC INSTITUTIONAL MEMBERSHIP

Institutions may join the SOC Consortium as entire institutions or appropriate subdivisions (e.g., colleges, schools, or major divisions). For membership in the SOC Consortium, an institution must meet three requirements:

- Each institution must satisfy six initial conditions.
- A responsible administrative official must commit the institution or the appropriate major subdivision to fully comply with and support the SOC Principles and Criteria as it delivers undergraduate postsecondary programs, courses, and supporting services to servicemembers on military installations or at locations accessible to them.
- The prospective institutional member must be approved as meeting SOC Principles and Criteria by the Director of SOC.

INITIAL CONDITIONS FOR MEMBERSHIP

Institutional members must meet the following conditions:

- be listed in the Council for Higher Education Accreditation's (CHEA) *Database of Programs Accredited by Recognized U.S. Accrediting Organizations*;
- be a degree-granting institution that is duly accredited by an institutional accrediting agency recognized by the U.S. Department of Education or by the Council for Higher Education Accreditation (CHEA);
- meet appropriate provisions of DOD Directive 1322.8, *Voluntary Educational Programs for Military Personnel*, DOD Instruction 1322.25, *Voluntary Education Programs*, and appropriate Service regulations when providing educational services on military installations;
- be approved for educational benefits by the appropriate State Approving Agency for veterans' benefits;
- agree to submit data for the *SOC Consortium Guide*; and
- not be listed by the U.S. Department of Education as having an excessive student loan default rate.

SOC CRITERIA

Inherent in the SOC Principles are expectations and standards essential to their translation into

performance and action. The SOC Criteria express those expectations and standards and constitute an operational framework for SOC member institutions to extend to servicemembers undergraduate educational opportunities that are sometimes distinct from common institutional practice. The Criteria characterize flexibility essential to the improvement of access by servicemembers to undergraduate educational programs. The Criteria stipulate that institutional policies and practices be fair, equitable, and effective in recognizing special and often limiting conditions faced by military students.

Criterion 1. Transfer of Credit.

Since mobility makes it unlikely that a servicemember can complete all degree program requirements at one institution, a SOC Consortium institution designs its transfer practices for servicemembers to minimize loss of credit and avoid duplication of coursework, while simultaneously maintaining the integrity of its programs. It is recognized that SOC Consortium institutions must maintain quality and integrity within a complex academic and regulatory environment where resource, regulatory, and academic realities sometimes militate against the broad spirit of flexibility that SOC advocates. Consistent with this reality and with the requirements of a servicemember's degree program, a SOC Consortium institution follows the general principles of good practice outlined in the *Joint Statement on the Transfer and Award of Credit*. Each institution may be required to submit documentary evidence that it generally accepts credits in transfer from other accredited institutions, and that its credits in turn are generally accepted by other accredited institutions.

Criterion 2. Academic Residency Requirements.

A SOC Consortium institution limits academic residency requirements for active-duty servicemembers to no more than 25 percent of the undergraduate degree program; recognizes all credit course work offered by the institution as applicable in satisfying academic residency requirements; and allows servicemembers to satisfy academic residency requirements with courses taken from the institution at any time during their program of study, specifically avoiding any "final year" or "final semester" residency requirement, subject to stated requirements in specific course areas such as majors. If a SOC Consortium institution offers one hundred percent of an undergraduate degree online, that institution may require active-duty servicemembers to take thirty percent of that degree program to obtain residency. (Institutions joining SOC for the purpose of participating in the Concurrent Admissions Program (ConAP) are exempted from this criterion.)

Criterion 3. Crediting Learning from Military Training and Experience.

A SOC Consortium institution provides processes to determine credit awards and learning acquired for specialized military training and occupational experience when applicable to a servicemember's degree program. A SOC Consortium institution recognizes and uses the *ACE Guide to the Evaluation of Educational Experiences in the Armed Services* in determining the value of learning acquired in military service, and awards credit for appropriate learning acquired in military service at levels consistent with *ACE Guide* recommendations and/or those transcribed by the Community College of the Air Force, when applicable to a servicemember's program.

Criterion 4. Crediting Extra-Institutional Learning.

Recognizing that learning occurs in extra-institutional and non-instructional settings, a SOC Consortium institution provides processes to evaluate and award appropriate undergraduate-level credit for such learning through practices that reflect the principles and guidelines in the statement on *Awarding Credit for Extraintitutional Learning*. This shall include awarding credit through use of one or more of the nationally-recognized, non-traditional learning testing programs provided for servicemembers by the OSD, such as described in the *ACE Guide to Educational Credit by Examination*. These examinations include CLEP, DSST, and ECE whether or not they supplement institutional challenge examinations or test-out procedures.

SOC INSTITUTIONAL OPERATING GUIDELINES

In addition to the SOC Criteria, some operating guidelines can be drawn from the SOC Principles and the experience of educational institutions and agencies that have shown success and quality in their educational offerings to servicemembers.

Admissions. In recognition of the preparation and experience of many servicemembers, SOC Consortium institutions facilitate the admission and enrollment of qualified candidates by providing means to determine levels of ability and achievement of servicemembers. Admissions practices, developed primarily for recent high school graduates, often work to the disadvantage of a servicemember who may be qualified for college-level work, yet may be unable to satisfy commonly imposed requirements. Specialized training and experience in the military Services or elsewhere, that may qualify individuals for college admissions and credit, often go unrecognized.

To facilitate admission and enrollment of qualified servicemembers, SOC Consortium institutions:

- recognize the GED high school equivalency certificate/diploma, utilizing ACE recommendations concerning academic performance;
- accept and record previously successful postsecondary study as part of the servicemember's program requirements, if appropriate;
- recognize learning gained from specialized training and experience in the military Services or elsewhere;
- establish competency by nationally-recognized means, such as standardized tests;
- publicize alternative admission procedures available to servicemembers;
- conduct timely evaluation of the educational records and relevant experiences of servicemembers;
- waive formal admission for servicemembers seeking enrollment in course work for transfer to another institution; and
- complete an education plan or degree plan for all servicemembers.

Extra-Institutional Learning. The military is an employer committed to providing genuine access to educational opportunity clearly connected to military workplace learning. In recognition of this commitment, SOC Consortium institutions help servicemembers and veterans to incorporate credits in their degree programs based on collegiate-level learning achieved not only through formal school training but also through occupational experience, and nationally-recognized, non-traditional learning testing programs. This learning can occur both in the military and in civil society.

Military occupational experience represents a legitimate area of learning outside the formal classrooms of specialized military training courses. A SOC Consortium institution should recognize the value of such experience and award appropriate credit for Military Occupational Specialties (MOS) and Navy Rates and Ratings as recommended by the ACE *Guide to the Evaluation of Educational Experiences in the Armed Services*.

Learning may also be acquired through other experiences, civilian non-collegiate courses, and collegiate non-traditional courses. Courses in the last group have evaluative mechanisms recognized by the

operating institution. Credit recommendations for training courses offered by business and industry, government, labor unions, and other public and private sectors are given in the *ACE National Guide to College Credit for Workforce Training*, the *ACE Guide to Educational Credit by Examination*, and *A Guide to Educational Programs in Noncollegiate Organizations* by the Board of Regents, The University of the State of New York.

The portfolio evaluation method, sponsored by the Council for Adult and Experiential Learning (CAEL) and used in some form by hundreds of institutions, is also an important aid in determining credit equivalence and applicability of experiential learning.

Distance Learning (Also see Attachment B, Principles of Good Practice for Higher Education Institutions Providing Voluntary Distance Education to Members of the U.S. Armed Forces and their Families). Increasing numbers of accredited colleges and universities offer distance learning opportunities to qualified students. Distance learning comes in a wide variety of modalities including online courses, video cassette courses, paper-based correspondence courses, instructor-enhanced independent study courses, and many variations of these and other methodologies. Instruction can occur synchronously among sites using a network of videoteleconferencing systems and locations. Most often instruction is asynchronous whereby students do not engage in learning together at a distance on a pre-set schedule. With distance learning, as with extra-institutional learning, SOC Consortium institutions must determine the comparability of the nature, content, and level of transfer credit in relation to their own course offerings. SOC Consortium institutions are diligent in evaluating the appropriateness and applicability of credits earned in transfer through distance learning from properly regionally and nationally accredited institutions. Generally SOC Consortium institutions can determine comparability by examining the course learning outcomes, course descriptions and other materials obtained from institutional catalogues, and from direct contact between knowledgeable and experienced faculty and staff at both the receiving and sending institutions.

DANTES provides useful listings of available independent study courses in its *Independent Study Catalog* and distance learning programs in its *External Degree Catalog*.

To enhance study opportunities for servicemembers, SOC Consortium institutions:

- advise and assist servicemembers to make maximum use of distance learning;
- provide their own modes of distance learning. Through advisement and listing in their publications, they make students aware of acceptable forms of distance learning available through other sources; and
- consider the acceptance in transfer, when appropriate to a servicemember's program, of credit earned through distance learning from other regionally and nationally accredited institutions.

Graduate Education. SOC Consortium institutional Operating Guidelines facilitate graduate program admissions, enrollment, and degree completion by servicemembers. SOC Consortium institutions offering graduate programs:

- recognize the maturity and experience of servicemembers as adult learners in admissions and enrollment policies and procedures;
- maximize institutional delivery options to meet the special needs of servicemembers;

- have flexible policies regarding the transfer of graduate credit by servicemembers and veterans from accredited institutions, and apply those credits where appropriate to meet degree requirements; and
- recognize graduate-level learning gained from specialized training and experience in the military Services as recommended by the *ACE Guide to the Evaluation of Educational Experiences in the Armed Services* and apply that credit to a student's degree program where appropriate.

Institutional Commitment. In order to achieve consistent application of policy in offering programs for servicemembers, SOC Consortium institutions make appropriate assignment of responsibility and monitor institutional performance in the delivery of such programs.

Programs for military students, whether offered on-campus or on an installation, require added institutional attention and supervision. Procedures that may have been effective for the traditional campus or student population no longer suffice. The nature of the institutional commitment to servicemembers needs to be made clear to institutional representatives as well as to the student.

Demonstrating their understanding of and commitment to servicemembers, SOC Consortium institutions:

- publicize widely to their faculty and students the nature of their commitment and programs and activities offered on behalf of servicemembers and include a statement of commitment to SOC in their catalogs;
- provide effective administrative staffing and processes to give adequate support to programs for servicemembers;
- develop procedural directives for instructors, counselors, admissions officials and program officers governing special requirements of servicemembers;
- ensure the comparability of off-campus courses to on-campus, while recognizing and accommodating programs to the particular needs of the adult learner;
- designate a contact office or person for servicemembers;
- designate a senior administrative official to oversee programs for servicemembers and veterans, monitor institutional compliance with the SOC Criteria, and serve as principal spokesperson and respondent on SOC matters;
- conduct staff orientation programs to prepare full-time and adjunct faculty to work with the adult part-time learner;
- provide scheduling on a planned program basis rather than by individual courses; and
- ensure access to all courses needed for degree completion by scheduling at appropriate locations and times, not necessarily related to regular academic terms.

College Recruiting, Marketing, and Student Services (See Attachment A, Standards of Good Practice for Servicemembers Opportunity Colleges for expanded information regarding these areas). To facilitate the enrollment process and continued student success of qualified servicemembers in postsecondary education, SOC Consortium institutions will:

- Outreach to servicemembers using advertising, college recruiting, and admissions information that adequately and accurately represents the programs, requirements, and services available. Military students considering course enrollments require adequate time to make informed decisions and consult with education service counselors. High-pressure promotional activities or “limited time only” enrollment discounts are inappropriate recruiting activities by SOC Consortium institutions.
- Provide adequate access to the range of student services appropriate to support the programs, including admissions, financial aid, academic advising, delivery of course materials, competency testing, course placement, and counseling.
- Ensure that students admitted into college programs possess the requisite knowledge and academic preparation to succeed. Where technology aids (computers, personal digital assistants, or other technology packets) are employed in the program as key instructional components, institutions must provide assistance to students who are experiencing difficulty using the required technology.
- Provide adequate, clearly established means for resolving student grievances. In particular, provide transparent due-process procedures related to tuition and financial aid matters, course withdrawals due to unanticipated deployments, lack of consistent computer connectivity, and changes of duty.

Veterans’ Services. For veterans returning to civilian life to begin or continue study, civilian SOC Consortium institutions provide appropriate evaluation of their training, experience, and prior study and other services similar to that afforded servicemembers. Some of the SOC Criteria apply equally to the institution's treatment of veterans—admission practices, transfer of credit, and recognition of other forms of learning, including military experience. When a servicemember has completed the residency requirement while on active duty at a SOC Consortium college, that college is obliged to recognize that fact when the servicemember becomes a veteran. Although broader instructional offerings and services may be available to returning veterans, counseling, evaluation, and planning are of particular importance in assisting them to reach their personal and career goals.

Recognizing the continuing educational needs of veterans, civilian SOC Consortium institutions:

- encourage veterans to continue or complete study started during service or interrupted by duty requirements;
- offer opportunities to veterans similar to those extended to servicemembers under the SOC Criteria, including provision of information and counseling services to ensure that veterans are aware of the benefits, regulations, and potential problems of veterans’ assistance programs;
- comply with the provisions of *38 USC 1775* pertaining to veterans’ educational assistance; and
- provide veterans, previously admitted as SOC Degree Network System students, with opportunities to complete their programs under the conditions of their Student Agreements.

Family Members’ and DOD Civilians’ Services. Families of active-duty servicemembers and DOD civilians, including Non-Appropriated Fund (NAF) employees, experience many of the same kinds of disruptions in pursuing a college degree as do active-duty servicemembers. Because of that, SOC Consortium and Degree Network System member institutions assist them by extending the considerations described for veterans under Veterans’ Services.

Attachment A
Standards of Good Practice for Servicemembers Opportunity Colleges

1. Communications with military members are clear, comprehensive, and completely truthful. Specifically, an institutional representative:
 - a. provides information on program requirements, course descriptions, tuition and related costs, schedules, and course delivery formats prior to the collection of personal contact information;
 - b. provides accurate and complete information to prospective students on accreditation status and what programs are covered;
 - c. clearly and truthfully presents prospective students with the prospects for academic degree or credit acceptance;
 - d. accurately describes occupational opportunities for program graduates;
 - e. accurately describes any partnerships with military or government agencies or endorsements or testimonials used in promotional actions; and
 - f. provides *bona fide* scholarship information that is unambiguously separate and distinct from any federal monies.

2. Enrollment and recruitment policies are appropriate to a higher education institution. Specifically, an institution will be held accountable for all recruitment and enrollment actions whether conducted by staff, faculty, partners, or other third party agents acting on the institution's behalf. The institution should:
 - a. primarily emphasize educational programs and services in all advertisements, promotional literature, and recruiting activities;
 - b. develop and use promotional and recruitment materials and practices that are ethical in every respect toward military members; promotional materials should not have the capacity to mislead or coerce students into enrolling;
 - c. establish legitimate enrollment deadlines, and *bona fide* scholarships and grants based on published criteria, and refrain from promotional tuition discounts that do not serve the best interest of the military or its members;
 - d. refrain from exerting undue pressure to enroll through follow-up calls or other forms of personal contact;
 - e. refrain from marketing/recruiting practices in which ancillary technology devices (laptops, printers, electronic readers, etc.) are offered as **inducements to enroll in an educational program**. Any conditions for receiving such an inducement must be readily achievable by the military student and must not pose significant financial hardship or undue burden for receipt;
 - f. perform telemarketing in accordance with the Federal Trade Commission and other state and federal regulations; and

- g. follow Department of Defense and military service guidance governing installation access and the use of retiree/dependent ID cards; retiree/dependent ID cards should not be used to gain base access for business purposes. All education-related activities on an installation or at an armory should be routed through the education center or Education Services Officer for authorization.
3. Fees charged to military members are clear and do not give a false, or misleading impression about the costs to either the military member or the military service. Specifically, an institution:
- a. provides prospective students with a clear understanding of the total financial obligation they have undertaken by engaging in specific academic pursuits. Information provided in catalogs, Web sites, and other media outlets should include the following minimum, clearly defined, financial information: cost of admissions, tuition (including the cost of instruction and associated fees), all mandatory fees, and the estimated cost of instructional materials;
 - b. agrees that the total cost of a program is the same for military members as that charged to any other student, except for legitimate military enrollment discounts that may apply;
 - c. applies military discounts to all servicemembers uniformly and equitably without restrictions unless further defined by specific contract requirements;
 - d. avoids the words “free” or “at no cost” to describe any item or service that is regularly included as a part of the institution’s program or services. These words should not be used to describe educational funding paid for with Department of Defense tuition assistance or Department of Veterans Affairs educational benefits due to the student obligation for government reimbursement in the event of unsuccessful course completion. The word “guarantee” is not used at all in promotional literature;
 - e. makes clear through a full explanation of what an electronic signature and online enrollment mean and the commitments they represent. There are personnel support and resources available for students who are unsure of what they may be signing and require additional explanation;
 - f. refrains from compensating or offering significant incentives or products to military members for providing referrals or directly influencing military students to attend a specific school; and
 - g. confirms that students have read and acknowledged their personal financial obligations and refund protections before they submit their registration.
4. Admissions policies and practices ensure appropriate academic screening and proper placement in courses and programs. Specifically, an institution:
- a. clearly states if any course or program prerequisites are needed for successful assimilation of the academic materials;
 - b. determines that students have the qualifications necessary to successfully enroll in a course or program, including most commonly a high school diploma or legitimate equivalent;
 - c. avoids an automatic renewal or continuous enrollment process with any courses or programs; and
 - d. clearly states a cooling-off or withdrawal period in which the student incurs no financial obligation for course enrollment.

5. Among the student services provided, there is a clearly defined process that includes a point-of-contact and a phone number for military/veteran students to communicate grievances and/or to discuss enrollment, instruction, and student service concerns/issues.
6. For institutions for which they apply, adhere to the **Title 16 Commercial Practices requirements in Chapter I – FEDERAL TRADE COMMISSION, – Part 254**. For-profit institutions should adhere to those standards when providing education courses and programs to servicemembers.
7. In addition, the **spirit of TITLE 16 – Commercial Practices, CHAPTER I – SUBCHAPTER D – Part 429** – “rule concerning a cooling-off period for sales...” applies to SOC Standards of Good Practice regarding financial commitments for academic coursework or programs. In terms of a cooling off period for financial/business transactions with servicemembers:
 - a. There should be a clearly stated period after enrollment in coursework or an academic program during which a student may withdraw the commitment and all financial liability. Said withdrawal period should comply with established state regulations.
 - b. The process for withdrawal from the commitment must be communicated clearly and plainly, in writing, without any misrepresentation.
 - c. The institution is required to establish and honor a formal, printed prorated tuition refund policy that is consistent with its drop/add policies for students who withdraw from course enrollment after the 100% financial refund deadline.

SOC Consortium Military Student Bill of Rights

The Military Student Bill of Rights spells out ten specific “rights” that military students should have as they explore, enroll, and work toward degrees or certificates at SOC Consortium colleges and universities.

Military Student Bill of Rights

All military student populations have basic rights to satisfactory college marketing, admissions, and student services practices including the right to:

- Accurate information about a school’s programs, requirements, accreditation, and its potential impact on course transferability.
- Access basic college/university information and fees without disclosure of student personal information.
- Educational planning and career guidance without high-pressure registration and enrollment efforts from institutions.
- A clear and complete explanation of course/program enrollment procedures and all resulting financial obligations.
- Explore, without coercion, all financial aid options before signing up for student loans or other financial assistance.
- Accurate scholarship information, free of misleading 'scholarship' offers based on military tuition assistance.
- Appropriate academic screening and course placement based on student readiness.
- Appropriate, accessible academic and student support services.
- Clearly defined institutional “drop/add” and withdrawal policies and procedures including information about the impact of military duties (e.g., mobilization, activation, temporary duty assignments) on their academic standing and financial responsibilities.

- Clearly defined grievance/appeals processes.