

# **NATIONAL ASSOCIATION OF STATE APPROVING AGENCIES, INC. (NASAA)**

**FRANK MYERS, PRESIDENT, NASAA**

**<>UNIFORM APPLICATION<>**

**<> WAVES, JULY 16, 2024<>**



**NASAA**  
**EST. 1948**

National Association of  
State Approving Agencies

# 38 U.S. Code § 3672A - UNIFORM APPLICATION

VA 22-10287, 22-10287A, 22-10288, 22-10288A

Andrew Martin - Education Consultant - Wisconsin Department of  
Veterans Affairs, State Approving Agency



**NASAA**  
EST. 1948

National Association of  
State Approving Agencies

# PL 117-333 SEC. 11 – CREATES 38 USC § 3672A UNIFORM APPLICATION (UA)

- PL 117-333 Passed January 5<sup>th</sup>, 2023
- “(a) IN GENERAL. -(1) The Secretary, in partnership with State approving agencies, educational institutions, and training establishments, shall require the use of a uniform application by any educational institution or training establishment seeking the approval of a new course of education under this chapter.
- “(2) The Secretary shall maintain one uniform application for institutions of higher learning and one such application for other educational institutions and training establishments.
- “(3) In the case of any State that uses approval criteria not covered by a uniform application under this section, the State approving agency for that State shall require the use of the uniform application and may require the submittal of additional information.
- Uniform Application Committee Convened - February 2<sup>nd</sup>, 2023



**NASAA**  
EST. 1948

National Association of  
State Approving Agencies



# SOUTH CAROLINA'S PROGRAMS CURRENTLY APPROVED EXCEL SPREADSHEET

AutoSave Off 2.1\_Programs Currently Approved No Label Search Myers, Frank MF

File Home Insert Page Layout Formulas Data Review View Help Acrobat

Clipboard Font Alignment Number Styles Cells Editing Sensitivity Add-ins Adobe Acrobat

Comments Share

112 Undergraduate Non College Degree Programs

Institution's Name													
Date >							Catalog						
Facility Code >							Academic 2024-2025						
Application 3675 > Programs Currently Approved													
Undergraduate Degree Programs													
Program Identifier in order	Name of Program/Course	IHL	NCD	Program: Revision, Teach-out and Deletion	Current Catalog Page Number (or attach curriculum)	Only Non-College Degree Programs Credit /Clock Hours Length	Initial Approval Effective Date	Comments					
Undergraduate Non College Degree Programs													
Program Identifier in order	Name of Program/Course	IHL	NCD	Program: Revision and Deletion	Current Catalog Page Number (or attach curriculum)	Only Non-College Degree Programs Credit /Clock Hours Length	Initial Approval Effective Date	Comments					
Graduate Degree Programs													
Program Identifier in order	Name of Program/Course	IHL	NCD	Program: Revision, Teach-out and Deletion	Current Catalog Page Number (or attach curriculum)	Only Non-College Degree Programs Credit /Clock Hours Length	Initial Approval Effective Date	Comments					

2024-2025- Programs - Curr-App Rev-Programs Currently App Deleted Programs Currently App ...

Ready Accessibility: Investigate 66%



**NASAA**  
EST. 1948

National Association of  
State Approving Agencies

# UNIFORM APPLICATION

- Currently required supporting documentation for approval actions
  - Different states may have different needs depending on the approval being completed.



**NASAA**  
EST. 1948

National Association of  
State Approving Agencies

# UNIFORM APPLICATION CONTINUES

- Most of these changes have already been incorporated into the Universal Application in the form of attestation statements:

<p><b>16. NEW FACILITIES ONLY - PLEASE SUBMIT DOCUMENTATION IDENTIFYING THE FOLLOWING:</b></p> <ul style="list-style-type: none"> <li>• The number of students who have entered and graduated from all programs during the preceding two-year period <u>and</u>;</li> <li>• If available, the cohort default rate for funds provided to the institution under Title IV of the Higher Education Act of 1965.</li> </ul>		
<p><b>PART IV OF WORKSHEET A: FACILITY CERTIFICATION AND ACKNOWLEDGEMENTS</b></p>		
<p><b>17. ALL FACILITIES - THE INSTITUTION CERTIFIES THE FOLLOWING STATEMENTS:</b></p> <ul style="list-style-type: none"> <li>• The institution complies with all applicable laws and regulations relating to the approval of courses of education.</li> <li>• During the five-year period preceding the date of this application, the institution has not been subject to, or been party to a contract with any individual or entity that has been subject to:             <ul style="list-style-type: none"> <li>◦ Any adverse administrative or judicial action that's related to the instruction or training, including with respect to the quality of education, provided by the institution or establishment; and resulted in a fine or penalty in an amount equal to or more than five percent of the amount of funding provided to the institution or establishment under Title IV of the Higher Education Act of 1965 for the fiscal year preceding the year in which the application is submitted;</li> <li>◦ Or has not employed an individual or been party to a contract with any individual or entity, that has been convicted of a <u>Federal</u> fraud charge related to the instruction or training provided by the institution or establishment.</li> </ul> </li> </ul>		
<p>Authorizing Official Initial Here</p>		<input style="width: 80px; height: 40px;" type="text"/>

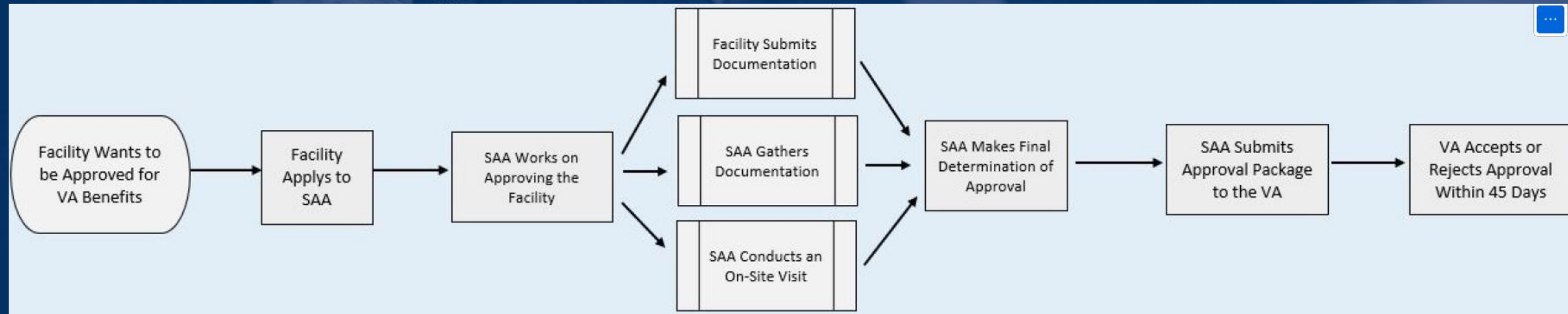
5A. INFORMATION REQUESTED	5B. PUBLICATION IDENTIFYING DATA (IF APPLICABLE - THE DOCUMENT(S) SHOULD INCLUDE VOLUME, NUMBER, AND DATE OF PUBLICATION)	5C. INFORMATION PROVIDED ON PAGE(S)
A LIST OF INDIVIDUALS WHO WILL SERVE AS FULLY QUALIFIED INSTRUCTORS AND INDIVIDUALS WHO WILL SERVE AS CAREER SERVICES EMPLOYEES FOR STUDENTS		



**NASAA**  
EST. 1948

National Association of  
State Approving Agencies

# PROGRAM APPROVAL FLOWCHART



Even with the Universal Applications, and while some states may do the order slightly differently, this workflow still fundamentally hasn't changed with the new forms! 😊



**NASAA**  
EST. 1948

National Association of  
State Approving Agencies



# IHL APPLICATION - VA 22-10287 & 22-10287A

- 22-10287 is required to be used for: IHL facility programs and medical residencies/fellowships
- We know there are updates/revisions needed to this form to standardize it with the NCD form

IN ADDITION TO THE NOTICE OF APPROVAL LETTER, DOES THE APPROVAL PACKET CONTAIN THE FOLLOWING:	
1	VA Form 22-8794 with training certificates? (original approvals)
2	VA Form 22-1919? (original approvals and changes to proprietary status or ownership) Proprietary Schools ONLY
3	VA Form 10-0144? (original approvals at proprietary vocational, trade, and technical ETIs)
4	Inspection visit report (Original Approvals) or verification of space, facility and equipment for a catalog or 24 month re-approval?
5	Application present?
6	Certified true and correct catalog, handbook, or bulletin?
7	Statement of verification that the educational institution offering the course has adequate space, equipment, instructional material, and instructor personnel to provide training of good quality?
8	Academic Calendar (including beginning and ending dates provided for each quarter/term/semester)?
9	Policies in place for progress, attendance, and conduct?
10	Tuition/Fees and other charges listed in catalog?
11	Program outlines for each approved program?
12	Prior credit policy?
13	Statement regarding erroneous, deceptive, or misleading practices or advertising were not found? -(Supporting documentation provided is a list of what SAA has reviewed)
14	Statement of evidence of financial soundness provided?
15	Evidence of compliance with the 2-year period of operation at NCD private facility? (original approvals, branch locations, change of ownership or location)
16	Pro rata refund policy?
17	Degree or certificate provided at completion?
18	Statement that school administrators, directors, owners, and instructors are of good reputation and character?
19	State license/authorization provided? (provide statement if not required by state)
20	DoD MOU between the school and base? (if the school is on a military base)
21	Statement the ETI does not prohibit attendance or impose penalties while awaiting VA payments per 38 USC 3679 (e)(1) A and B?
22	Statement that programs, curriculum, and instruction are consistent with similar in quality, content, and length?
23	Approval documents submitted by the SAA show evidence of the date when all documentation to support the approval package was received by the SAA?
24	EFT information? (originals only)
25	Template of the ETI's shopping sheet or statement they use one?




**NASAA**  
EST. 1948

National Association of  
State Approving Agencies

# NON-IHL APPLICATION - VA 22-10288 & 22-10288A

- 22-10288 is required to be used for: Non-IHL Facilities
- The VA has agreed that only the section/worksheet of the facility you're approving needs to be submitted.
- Apprenticeships need both the 22-10288 and the 22-8865 or 22-10288A. Other than that, you may use your own forms to collect course info.

 Department of Veterans Affairs		
APPLICATION FOR APPROVAL OF ORGANIZATIONS OTHER THAN INSTITUTIONS OF HIGHER LEARNING		
PART I: GENERAL INFORMATION		
1. TELL US WHAT TYPE OF COURSES YOUR FACILITY PROVIDES AND WISH TO BE APPROVED FOR A VA EDUCATION BENEFITS (Please select only one option per facility code. If your facility has more than one facility code, please fill out a new application for each facility code.)		
<input type="checkbox"/> <b>NON-COLLEGE DEGREE.</b> A vocational, business school or public safety/training academy which offers certificate or diploma programs that do not lead to a standard college degree at the associate level or above. Programs approved at this facility must have a defined vocational objective and be measured in either credit or clock hours. (Please complete Worksheet A only.)		
<input type="checkbox"/> <b>VOCATIONAL FLIGHT SCHOOL.</b> Parts 141 and 142 flight training programs necessary for the attainment of a recognized vocational objective in the field of aviation. (Please complete Worksheet B only.)		
<input type="checkbox"/> <b>LICENSE/CERTIFICATION EXAM.</b> An organization that issues licenses or certifications demonstrating a level of knowledge or skill required to enter into, maintain, or advance in employment and is generally accepted with government, business, or industry standards. (Please complete Worksheet C only.)		
<input type="checkbox"/> <b>PREPARATORY COURSES FOR LICENSE/CERTIFICATION.</b> An organization which offers programs to prepare an individual for a licensing or certification test that is required or used to enter into, maintain, or advance in employment in a predetermined and identified vocation or profession. These facilities do not receive tuition payments directly from the VA and veterans are not paid a monthly housing allowance. Instead, veterans are eligible to submit for tuition reimbursement. (Please complete Worksheet D only.)		
<input type="checkbox"/> <b>CORRESPONDENCE SCHOOL.</b> A program of education exclusively by correspondence, or the correspondence portion of a combination correspondence-residence course leading to a vocational objective, that is offered by an accredited educational institution. (Please complete Worksheet E only.)		
<input type="checkbox"/> <b>HIGH SCHOOL.</b> A public or private secondary school which offers a standard high school diploma as recognized by the state in which the school is operating. (Please complete Worksheet F only.)		
<input type="checkbox"/> <b>APPRENTICESHIP OR ON-THE-JOB TRAINING.</b> A program of apprenticeship as meeting the standards of apprenticeship published by the Secretary of Labor pursuant to the National Apprenticeship Act, or a program of training on the job in which the objective of progression and appointment to the next higher classification is based upon skills learned through organized and supervised training on the job and not on such factors as length of service and normal turnover. (Please complete Worksheet G only.)		
<input type="checkbox"/> <b>MULTI-STATE APPRENTICESHIP TRAINING.</b> Apprenticeship sponsors that have a multi-state apprenticeship program registered and approved by the U.S. Department of Labor's Office of Apprenticeship to operate nationally requesting approval from the SAA with jurisdiction over the state in which the sponsor is headquartered. (Please complete Worksheet H only.)		
REVIEW OF PROGRAMS - YOU MUST ALSO SUBMIT THE LIST OF PROGRAMS OR EXAMS FOR APPROVAL ON A SEPARATE FORM PROVIDED BY THE STATE APPROVING AGENCY FOR WHICH YOU ARE REQUESTING APPROVAL.		
2A. NAME OF ORGANIZATION		2B. VA FACILITY CODE (If known)
3A. PHYSICAL ADDRESS		3B. MAILING ADDRESS (If same, leave blank)
4. ORGANIZATION WEBSITE ADDRESS		
PART II: INSTITUTION CONTACTS		
5A. NAME OF SCHOOL CERTIFYING OFFICIAL (Leave blank for initial application)		5B. SCHOOL CERTIFYING OFFICIAL EMAIL ADDRESS (Leave blank for initial application)
PART III: CERTIFICATION AND SIGNATURE OF AUTHORIZING OFFICIAL		
6. ADDITIONAL DOCUMENTATION - THE STATE APPROVING AGENCY AND/OR VA MAY REQUIRE ADDITIONAL INFORMATION OR DOCUMENTATION TO PROCESS A FACILITY APPROVAL AND MEET APPLICABLE STATE OR LOCAL LAWS.		
I CERTIFY THAT all statements in this application are true and correct to the best of my knowledge and belief.		
6A. NAME OF AUTHORIZING OFFICIAL	6B. SIGNATURE OF AUTHORIZING OFFICIAL	6C. DATE SIGNED (MM/DD/YYYY)
<b>PRIVACY ACT INFORMATION:</b> VA will not disclose information collected on this form to any sources other than what has been authorized under the Privacy Act of 1974 or Title 38, Code of Federal Regulations, Section 1.526 for routine uses (e.g. VA sends education forms or letters with a veteran's identifying information to the veteran's school or training establishment to (1) assist the veteran in the completion of claims forms or (2) for the VA to obtain further information as may be necessary from the school for the VA to properly process the veteran's education claim or to monitor his or her progress during training as identified in the VA System of Records, 58VA11/22/28, Compensation, Pension, Education and Veteran Readiness and Employment Records - VA, published in the Federal Register.		
<b>RESPONDENT BURDEN:</b> The respondent population for this form are educational training institutions that work coordinately with third-party State Approving Agencies. We need this information to determine whether your institution can have programs approved by a State Approving Agency for the purpose of VA Educational Benefits. We estimate that you will need an average of 8 hours to review the instructions, find the information and complete this form. VA cannot conduct or sponsor a collection of information unless a valid OMB control number is displayed. You are not required to respond to a collection of information if this number is not displayed. Valid OMB control numbers can be located on the OMB Internet Page at <a href="http://www.reginfo.gov/public/do/PRAMain">www.reginfo.gov/public/do/PRAMain</a>		



**NASAA**  
EST. 1948

National Association of  
State Approving Agencies

# UNIFORM APPLICATION COMMON QUESTIONS

- Q - Do I actually need to use these applications?
  - A - Yes. This is a Federal law, which means we are required to implement these requirements for new course approvals.
- Q - Do I need to use both the Uniform Application & VA 22-8865 for a
- Registered Apprenticeship?
  - A - Yes. The previous policy of only submitting an 8865 was a VA agreement which was supplanted by the new Federal law.
  - Facilities should fill out and submit BOTH the application and either the 22-8865 or the 22-10288A section for the job they are looking to have approved. To meet the law, you'll need both.



**NASAA**  
EST. 1948

National Association of  
State Approving Agencies

# UNIFORM APPLICATION COMMON QUESTIONS CONTINUES

- Q - Do I need to use the 22-10287A form collecting program information for my flagship IHL's new programs?
  - A - NO! SAA's are not required to use the "A" forms, and still may use your own forms. (Such as Excel spreadsheets). However, you do need to collect the elements of approval for the course.
- Q - Why does the form not list all the documentation to collect for an approval? (e.g. VA 22-1919, 10-044A)
  - A - Every state has a different process for collecting additional documentation and not all documentation is needed for every approval action. This collection process is up to individual states.



**NASAA**  
EST. 1948

National Association of  
State Approving Agencies

# UNIFORM APPLICATION COMMON QUESTION- CONTINUES

- Q - Our state has a cosmetology school completing a 24-month review but not adding a new program. Do I have to use the new application?
  - A - No. The law only requires the Uniform Application be used when an approval is adding any new courses.
- Q - Can an SAA use the Uniform Application for a 24-month review, even if the facility is not adding courses?
  - A - Yes! That is a state-by-state decision.
- Q - Can our state use the Uniform Application for actions not related to adding courses, such as a change of location?
  - A - Yes! Your state may determine that this application is used for all types of approval actions. That is a state-by-state decision



**NASAA**  
EST. 1948

National Association of  
State Approving Agencies

# UNIFORM APPLICATION COMMON QUESTION- CONTINUES

- Q - Does a facility need to complete every section of the form when requesting an approval action?
  - There is no law or official guidance from the VA about what is or isn't required to be completed by a facility seeking approval.
  - The ELR Job Aids define what elements must be identifiable to ELRs when processing new facility and 24-month reviews. The Uniform Application can serve as evidence for the Job Aid that things like T&F, prior credit policies, and refund policies exist.
  - This is fundamentally unchanged from how the current process where ELRs review any checklists you currently use as a state.



**NASAA**  
EST. 1948

National Association of  
State Approving Agencies

# UNIFORM APPLICATION COMMON QUESTIONS - CONTINUES

- Q - (Cont.) Does a school need to complete every section of the form when completing an approval?
  - A - Every state may make different determinations about what parts of the Uniform Application may need to be filled depending on the action being requested by the facility.
    - For Example, if doing a program addition to a current catalog, you likely do not need the entire context of the catalog re-evaluated as the catalog remains approved and unchanged.
- Different states may have different needs depending on the approval being completed.



**NASAA**  
EST. 1948

National Association of  
State Approving Agencies

# QUESTION AND ANSWER!



**NASAA**  
EST. 1948

National Association of  
State Approving Agencies