



**DEPARTMENT OF VETERAN AFFAIRS**  
**Veterans Benefits Administration**  
**Education Service**  
**Washington, D.C. 20420**

March 21, 2024

Kari Woodman  
Financial Aid Specialist  
Pierpont Community and Technical College  
500 Galliher Dr.  
Fairmont, WV 26554

Facility Code: 14810648

Dear Kari Woodman,

A compliance survey was conducted on March 20, 2024, at your institution. Thank you for the kindness and cooperation you extended to me during the survey process. Attached you will find the narrative report of the survey findings, including any discrepancies found during the visit. This attachment will provide more specific information concerning the individual discrepancies, if any.

If you have questions or require assistance with any VA regulations or requirements, please contact the Education Liaison Representative for your state by email at [ELR-WestVirginia.VAVBABUF.RO.EDU@va.gov](mailto:ELR-WestVirginia.VAVBABUF.RO.EDU@va.gov) or contact the Education Hotline at 888-GIBILL-1 (888-442-4551), or [Ask VA](#).

Sincerely,

*Krista Bonuccelli*

Krista Bonuccelli  
Education Compliance Survey Specialist - Contractor  
Saint George Consulting  
(843) 484-1899  
[Krista.Bonuccelli@va.gov](mailto:Krista.Bonuccelli@va.gov)

Enclosure: Narrative Report

## Pierpont Community and Technical College

500 Galliher Dr.  
Fairmont, WV 26554

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### **I. GENERAL**

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The purpose of a Compliance Survey is to ensure that approved programs are compliant with all applicable provisions of Title 38, United States Code (USC) § 3693 administered by VA.

A routine Compliance Survey was conducted onsite at Pierpont Community and Technical College (referred to throughout as the ETI) by Education Compliance Survey Specialist-Contractor (ECSS-C) Krista Bonuccelli. The official notification of the survey was delivered via email to Kari Woodman on 03/06/2024. An entrance briefing and exit briefing were held on 03/20/2024.

**Date of Last Approval:** The date of last substantive approval action found in WEAMS was 08/01/2022. This date is within the 24-month limitation.

**Student Sampling:** The Active Student Count reported in the VA system was 21, and the ETI reported 29. In accordance with the AC&L FY21 Compliance Survey Strategy and Guidance, the initial sample size was ten (10) VA beneficiaries and one (1) randomly selected non-VA student record. The sample distribution was based on the available records and included eight (8) - Chapter 33 records, two (2) - Chapter 35 records, zero (0) - Chapter 30 records, and zero (0) - Chapter 1606 records. The ETI participates in the Yellow Ribbon (YR) program. Of the Chapter 33 students selected for student sampling, one (1) student has participated in YR.

One (1) Non-VA student file was reviewed to verify that the cost of tuition and fees for VA beneficiaries was not greater than the charges for similarly circumstanced students. The findings were consistent with the VA beneficiary records. No issues were identified.

**Prior Compliance Survey Information:** The most recent Compliance Survey was conducted onsite by SGC on behalf of the VA in FY22. The survey took place from 01/13/2022 to 01/14/2022. The review period was covered from 08/01/2018 through to 12/31/2021. The review period end date should have been reported as 12/03/2021. The survey was reviewed and found to have the following discrepancies:

- Late reporting
- The facility did not report unsatisfactory progress to the VA
- Inaccurate enrollment dates certified

**Current Survey:** The review period for this survey was covered from 12/06/2021 through to 02/23/2024.

**ETI Information:** Pierpont Community and Technical College is an accredited, public Institution of Higher Learning (IHL).

Per the Web Enabled Approval Management System (WEAMS), the ETI has 3 School Certifying Officials (SCOs). The list of SCOs on WEAMS was reviewed and found to be accurate.

**Prior Credit (38 CFR 21.4253, 21.4254, 21.4263):** Prior credit was reviewed, and credit was granted where appropriate. Pierpont Community and Technical College requires all students to provide official transcripts and military training records for evaluation. Evaluation is sent to the Registrar's Office to determine if training is equivalent and granted. The degree audit report and transcript do reflect transfer credit granted. The ETI was found to be within compliance standards.

**GI Bill® Feedback Tool:** The GI Bill® Feedback Tool system was reviewed prior to conducting the Compliance Survey and no complaints were found in the current review period.

**Entrance Briefing:** The entrance briefing was conducted on 03/20/2024. The following individuals attended this briefing:

	Name	Title	SCO
1	Kari Woodman	Financial Aid Specialist	Yes – Primary
2	J.J. Davis	Registrar	No

**During the Entrance Briefing, the following topics were discussed:**

- Introduction of ECSS-C, Krista Bonuccelli, and introductions of the ETI officials
- Provided an overview of the Compliance Survey process
- Received survey documents and records for review

## **II. DISCREPANCIES (VA FORM 22-1934: AREAS OF REVIEW)**

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No discrepancies were found within areas of review enumerated in VA Form 22-1934.

### III. SUMMARY

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**Exit Briefing:** An exit briefing was conducted on 03/20/2024. The following individuals attended this briefing:

	Name	Title	SCO
1	Kari Woodman	Financial Aid Specialist	Yes – Primary
2	J.J. Davis	Registrar	No
3	Catherine Gorman	Records Specialist & Veterans Admin Coordinator	Yes – Secondary

**At the Exit Briefing, the following topics were discussed:**

- Thanked the ETI officials for providing space to conduct the survey
- Provided an overview of the items reviewed during the survey
- Provided a description of the role of the ECSS-C and what to expect beyond the survey regarding a findings letter and a final narrative report

**Additional Assistance Provided:** No additional assistance was provided.

**Beneficiary Interviews:** This is not applicable for this ETI.

**Review of 85/15 Compliance and 35% Exemption Waiver (38 CFR 21.4201(d)):** The ETI has a 35% Exemption, covering all programs effective 04/12/2023. The percentage on VA beneficiaries is 1.7%. As such, 85/15 documents were not collected or reviewed for this compliance survey.

**Enrollment Limits:** The State Approving Agency has not established any enrollment limits in the Notice of Approval at this time for this ETI. The ETI was found to be within compliance standards.

**Repeat Discrepancies and/or Issues:** There were no repeat discrepancies found.

**Review of Advertising Materials:** The ETI's advertising was reviewed (social media, ETI website, and catalog). At the conclusion of the review, no misleading nor deceptive advertisings were found. The ETI was found to be within compliance standards.

**Power of Attorney and Non-assignability of Benefits (38 CFR 21.4146, 21.9680):** ETIs and training establishments are prohibited from negotiating VA educational assistance benefit payments. All student payments were issued to personal accounts by direct deposit. There were no paper checks issued. It was confirmed the ETI did not have Power of Attorney for any VA beneficiary. The ETI was found to be within compliance standards.

**Independent Study (38 CFR 21.4267):** The ETI is approved for independent study and was found to be within compliance standards.

**Practical Training (38 CFR 21.4265):** The ETI is approved for practical training. The ETI was found to be within compliance standards.

**Cooperative Courses and Farm Cooperative Courses (38 CFR 21.4233, 21.4257, 21.4264):** The ETI is not approved for cooperative courses. The ETI was found to be within compliance standards.

**Two-Year Period of Operation for Branches (38 CFR 21.4251):** This is not applicable to this ETI.

**Tutorial Assistance (38 CFR 21.4236, 21.9685):** The ETI does not have any participants in the Tutorial Assistance program through the Department of Veterans Affairs. The ETI was found to be within compliance standards.

**Owner/Officer Restriction and Conflicting Interests Certification (38 CFR 21.4005, 21.4202(c), 21.5001, 21.7305, 21.7805, 21.9770):** The ETI is a public institution and therefore this certification is not applicable.

**Contractual Arrangements (38 CFR 21.4233(e)):** The ETI does not offer any courses under contract. The ETI was found to be within compliance standards.

**Advance Pay (38 CFR 21.4203, 21.9715):** The ETI is not approved to receive advance pay checks for delivery to students. The ETI was found to be within compliance standards.

**Nonduplication of Benefits (38 CFR 21.4020, 21.4022, 21.5022, 21.5023, 21.7143, 21.7642, 21.9690):** No duplication of benefits was found during this survey. The ETI was found to be within compliance standards.

**Yellow Ribbon (38 CFR 21.4254(c)):** The ETI does participate in the Yellow Ribbon (YR) program. The YR contract was reviewed. The ETI was found to be within compliance standards and is paying their half of tuition and fees.

**Recruiting Practices (38 U.S.C. 3696(d)(1)):** The ECSS-C reviewed the School Procedures Questionnaire and other available documents, and there was no evidence of fraudulent or unduly aggressive recruiting practices.

**School Certifying Official (SCO) Beneficiaries: CFR §21.9675(d) states the VA will not pay benefits for courses certified to the VA by the individual taking the course:** VA systems were reviewed to identify if any SCOs have utilized VA benefits at Pierpont Community and Technical College and it was found that no SCOs have utilized VA benefits at the ETI. The ETI was found to be within compliance standards.

**Review of Public Law 115-48 (Colmery Act)- Priority Enrollment:** It was confirmed the ETI offers priority enrollment. The ETI was found to be within compliance standards.

**Review of Annual Reporting Fees:** PL 111-377 (Section 204) states that any reporting fee paid to an educational institute shall be utilized by such institution or committee solely for the making of certifications or for otherwise supporting programs for Veterans. The funds are used solely for the veteran students. The fund are generally used to support the Veteran's Student Lounge, as well as support VA student trips and activities. The ETI was found to be within compliance standards.

PL 115-48 (section 304) states that if an ETI receives reporting fees for 100 or more eligible students, then the reporting fees paid to the ETI cannot be used for, or merged with, the ETI's general fund. The ETI did not receive payment for more than 100 students, and does not maintain a separate fund account. The ETI was found to be within compliance standards.

**GI Bill® Trademark:** In accordance with Executive Order 13607(f), the ETI's usage of the trademarked phrase "GI Bill" was reviewed (social media, ETI website, and catalog). The ETI was found to be within compliance standards. GI Bill® is a registered trademark of the U.S. Department of Veterans Affairs (VA). More information about education benefits offered by VA is available at the official U.S. government website <https://www.benefits.va.gov/gibill>

**Narrative Report  
Compliance Survey**

**Public Law 116-315, Section 1018:** A signed statement of compliance was collected during this compliance visit. The ETI was found to be within compliance standards.

**Principles of Excellence (PoE):** The ETI does participate in Principles of Excellence. A signed statement of compliance was collected during this compliance visit. The ETI was found to be within compliance standards.

**Compliance Survey Close-out Notice:** Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of additional statements in this report concerning your ETI's specific practices and procedures cannot be construed as acceptance, approval, or endorsement of those specific practices and procedures by the Department of Veterans Affairs. The successful completion of this Compliance Survey does not relieve your ETI of its obligation to comply with all statutory and regulatory provisions governing USC Title 38 Veterans Benefits programs.

This Compliance Survey Narrative was completed on 03/20/2024 by Krista Bonuccelli.

*Krista Bonuccelli*

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Education Compliance Survey Specialist  
Saint George Consulting