

VA | SCO Bootcamp

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PRESENTED BY: JEROME GOLOMBEK
KATHY MITCHELL



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Objectives

By the end of this session you should be able to:

- Contact the correct point of contact with questions you may have.
- Be able to properly certify routine certifications and changes in enrollment.



2017 Beneficiary Data

In Fiscal Year (FY) 2018 the Department of Veterans Affairs (VA) paid 893,725 VA beneficiaries over 11 billion dollars in education benefit payments ([Annual Benefits Report](#)).



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VA Relationships



VA Relationships – VA Beneficiaries

- Includes Veterans, Servicemembers, and spouse/child dependents who are using VA education benefits.
- Can be significantly impacted by changes or delays to their education benefits.
- VA beneficiaries can get information about VA education benefits from the [GI Bill® website](#) or receive regular updates from the [Post-9/11 GI Bill Facebook](#) webpage.
- VA beneficiaries can contact the VA through the VA Call Center, the [Internet Inquiry System](#) (“Right Now Web”), the [GI Bill Feedback System](#), and by sending postal mail to the [3 Regional Processing Offices](#) (RPOs).



VA Relationships – School Certifying Officials (SCOs)

- The designated individual at a facility who serves as the liaison between the facility and VA.
 - The facility determines the qualifications for their representative (i.e. some will require prior military service and an advanced degree, others will require no college education and the SCO will also be responsible for other duties at the facility). The VA cannot dictate how many SCOs a facility should have or what educational credentials they should possess.
 - VA Form 22-8794 – “DESIGNATION OF CERTIFYING OFFICIAL(S)” – must be completed and submitted to the Education Liaison Representative (ELR) of jurisdiction in order to add, delete, or change the SCOs at a facility. It is important to remember that a new VA Form 22-8794 will completely replace the previous version.
- The primary duty of SCOs is to report VA beneficiary enrollments, changes to enrollment, graduation and to ensure that the facility remains in compliance with all requirements of their facility’s approval to receive VA benefits.

VA Relationships – School Certifying Officials (SCOs)

- SCOs can get information about VA specific policies, procedures, and responsibilities from:
 - The [School Certifying Official Handbook](#)
 - The [VA-ONCE Quick Reference User Guide](#)
 - The online [School Official Training](#)
 - [VA Central Office \(VACO\) National Webinars](#)
 - The [School Resources Webpage](#)
 - The [VA Work-Study Webpage](#)
 - The [GI Bill® Website](#)
 - The [Post-9/11 GI Bill Facebook Webpage](#)



VA Relationships – State Approving Agencies (SAAs)

- State agencies contracted with the VA for primary oversight of approving programs for eligibility to be reimbursable through VA education benefits.
- SAAs have the primary responsibility of ensuring that programs approved to receive VA benefits remain in compliance with all laws, regulations, and procedural requirements.
- SAAs also assist with conducting Compliance Surveys and Risk-Based Compliance Surveys.
- SAAs do not work for the VA. They work, under contract, with the VA.
- Contact information for SAAs can be found on the [National Association of State Approving Agencies \(NASAA\)](#) website.



VA Relationships – Education Liaison Representatives (ELRs)

Federal employee who:

- Serves as the secondary approval authority for facilities.
- Serves as the primary payment approval authority.
- Serves as the primary VA system authority.
 - Maintains the VA Online Certification Enrollment (VA-ONCE) system and the Web Enabled Approval Management System (WEAMS) system.
- Serves as the primary trainer and point of contact for SCOs and school faculty and staff.
- Serves as the VA's primary point of contact for SAAs.
- Serves as the primary point of contact for program inquiry requests from the VA Processing Team.

VA Relationships – Education Compliance Survey Specialists (ECSSs)

Federal employee who:

- Conducts Compliance Surveys and Risk-Based Compliance Surveys.
 - Ensures that facilities are promptly and correctly certifying information to the VA.
 - Ensures that facilities are meeting all requirements of their approval (i.e. following their refund policy, attendance policy, standards of progress, etc).
 - Ensures that facilities are in compliance with all statutory and regulatory requirements (i.e. GI Bill trademark compliance, equity of charges between VA beneficiaries and other students, etc).
 - May meet with VA beneficiaries for one-on-one interviews during a Compliance Survey.
 - Documents and archives findings and supplemental documents.

VA Relationships – Veterans Claims Examiner (VCE)

Federal employee who:

- Determines the eligibility of VA beneficiaries. This includes:
 - Approval of work-study positions (nationally located in the Muskogee RPO).
 - Approval of VA beneficiaries eligibility for VA Education benefits. For beneficiaries receiving the Post-9/11 GI Bill (Chapter 33) benefit this includes determining the beneficiary's benefit level.
- Properly adjudicates VA beneficiary claims based on received documentation from VA beneficiaries and SCOs. This includes:
 - Releasing payments to VA beneficiaries and facilities.
 - Creating debts on VA beneficiaries and facilities.
 - Processes VA beneficiary audits when required.
- Properly adjudicates VA beneficiary Notices of Disagreement.



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VA Relationships – National Education Call Center

- Provides general information regarding VA education benefits to callers.
- Provides case specific information to individual VA beneficiaries about the status of their claim or provides information about why a particular decision was made.
- Has a SCO Hotline that provides case specific information to SCOs about the status of VA beneficiaries' claims, provides the SCO with information about why a particular payment decision was made, or allows SCOs to report VA beneficiaries experiencing hardship conditions.

NOTE: The SCO Hotline answers **payment** related questions. SCOs should refer all **approval** and **certification** questions to the their ELR or SAA.

Who To Call – When To Call – Approval Or Certification Questions

1. SCOs should contact their SAA and ELR with questions concerning the approval of their facility or about submitting certifications.
 - Example 1: “Can I certify this class for GI Bill reimbursement?”
 - Example 2: “What term dates should I use when certifying this term?”
 - Example 3: “How is this student counted for compliance with the 85-15 Rule?”



Who To Call – When To Call – Payment Questions

2. SCOs should contact the VA SCO Hotline (855-225-1159) or RPO of jurisdiction via the [Internet Inquiry System](#) or through [postal mail](#) with all payment and payment status questions.
 - Example 1: “I certified a beneficiary’s certification a month ago and still have not received a tuition and fees payment, what is the status of the claim?”
 - Example 2: “Why is this tuition and fees payment less than what I certified for?”
 - Example 3: “This student is in financial hardship, can their case be escalated?”

**Remember – The SCO Hotline phone number is for SCOs only – do NOT provide this phone number to students.

Who To Call – When To Call – Work-Study Questions

3. SCOs should contact the National Work-Study Team (855-225-1159 – option #2) with all VA Work-Study related questions.
 - Example 1: “How do I certify a VA Work-Study’s hours?”
 - Example 2: “Can a student’s Work-Study contract be extended?”
 - Example 3: “How does a school apply to get more VA Work-Study students?”

Reminder #1 – The National Work-Study Team phone number is for SCOs only – do NOT provide this phone number to students.

Reminder #2 – All Work-Study documentation submissions or requests should be made through the [Internet Inquiry System](#).

Who To Call – When To Call – Disputing A Debt

4. SCOs should contact the Debt Management Center (DMC) at 1-800-827-0648 when disputing a debt assigned to their facility.



Laws, Regulations, And Policies



Public Laws and Statutes

Federal Laws are passed by Congress and signed by the president (or there is sufficient congressional support to override a presidential veto). Congress create bills that, when passed, become statutory law.

For Education Service these will be identified as Public Law (PL) or United States Code (USC).

Examples:

- Harry W. Colmery Veterans Educational Assistance Act of 2017 (Public Law 115-48)
- 38 USC 3675

Regulations

Regulations are standards and rules adopted by administrative agencies that govern how laws will be enforced. Like laws, regulations are codified and published so that parties are on notice regarding what is and isn't legal.

Regulations often have the same force as laws, since, without them, regulatory agencies wouldn't be able to enforce laws.

For Education Service these will be identified as Code of Federal Regulations (CFR). All approved forms (which can be identified by having the VA FORM on the bottom left hand corner and then a number) will have also gone through a stringent review process.

Examples:

- 38 CFR 21.4253
- 38 CFR 21.4254

Policies, Rules, And Inquiry Responses

Agency specific procedures that provide instructions on how to enact formal regulations. These are normally notices provided from VA Central Office (VACO) or your ELR of jurisdiction.

Example:

- [SCO Handbook](#)
- [VA-ONCE Quick Reference User Guide](#)
- [VA Central Office Webinars](#)
- Academic Progress Letter



VA Education Benefits



Post-9/11 GI Bill Benefit (Chapter 33)

Payments under the Post-9/11 GI Bill Benefit include:

- Tuition and fees payments made directly to the facility
- An annual books and supplies stipend made to the VA beneficiary

Payments may also potentially include:

- A Monthly Housing Allowance (MHA) payment to the VA beneficiary
- A one-time rural benefit payment to the VA beneficiary
- A Yellow Ribbon Program (YRP) payment to the facility



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Post-9/11 GI Bill Benefit (Chapter 33)

More in-depth information about the Post-9/11 GI Bill benefit can be found at:

- [GI Bill Website – Post-9/11 GI Bill](#)
- [GI Bill Website – Payment Rates](#)
- [GI Bill Website - Yellow Ribbon Program](#)
- [GI Bill Website - Marine Gunnery Sergeant John David Fry Scholarship \(Fry Scholarship\)](#)



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Non-Chapter 33 Benefits

Non-Chapter 33 benefits include:

- Montgomery GI Bill – Active Duty (Chapter 30)
- Montgomery GI Bill – Selected Reserve (Chapter 1606)
- Survivors and Dependents Educational Assistance (DEA) (Chapter 35)
- Post-Vietnam Era Veterans Educational Assistance Program (VEAP) (Chapter 32)
- Reserve Educational Assistance Program (REAP) (Chapter 1607)
 - Effectively sunset effective November 25, 2019



Non-Chapter 33 Benefits

Non-Chapter 33 benefits are always paid directly to the VA beneficiary and are generally based on a monthly rate or are directly related to the mandatory tuition and fees charges of the approved program the VA beneficiary is enrolled in.

Specific payment information for Non-Chapter 33 benefits can be found on the [GI Bill website](#).

A side by side comparison chart of VA education benefits can be found on the [GI Bill website](#).



Vocational Rehabilitation and Employment Benefits (Chapter 31)

Vocational Rehabilitation and Employment benefits are **not** a VA Education benefit.

Vocational Rehabilitation and Employment benefits are similar to VA Education benefits, but have their own unique rules and caveats. Questions about certifying VA beneficiaries receiving this benefit should be made to the VA beneficiaries' Vocational Rehabilitation and Employment Benefits counselor.

The ELR and SAA of jurisdiction will be unable to actively assist with questions regarding Vocational Rehabilitation and Employment benefits.

Additional information about Vocational Rehabilitation and Employment benefits can be found on the [GI Bill website](#).

VA Forms



VA Forms

- Unprotected VA forms can be found on the [GI Bill website](#).
- Protected VA forms can be received through your [ELR](#).



VA Forms – Facility Specific

- VA Form 22-8794 - Designation Of Certifying Official(s)
- Statement Of Assurance Of Compliance With 85/15 Enrollment Ratios



VA Forms - Certification

- VA Form 22-1999 - VA Enrollment Certification
- VA Form 22-1999b - Notice Of Change In Student Status

NOTE: Most facilities use the VA-ONCE system to electronically complete and submit these forms.



VA Forms – VA Beneficiary

- [VA Form 21-4193 - Notice to Department of Veterans Affairs of Veteran or Beneficiary Incarcerated in Penal Institution](#)
- [VA Form 22-0803 - Application for Reimbursement of Licensing or Certification Test Fees](#)
- [VA Form 22-0810 - Application for Reimbursement of National Exam Fee](#)
- [VA Form 22-0993 - Request to Opt-Out of Information Sharing with Educational Institutions](#)
- [VA Form 22-0989 - Education Benefit Entitlement Restoration Request Due to School Closure or Withdrawal](#)
- [VA Form 22-1990 - Application for VA Education Benefits](#)
- [VA Form 22-1990e - Application for Family Member to Use Transferred Benefits](#)
- [VA Form 22-1990t - Application for Individualized Tutorial Assistance](#)



VA Forms – VA Beneficiary

- VA Form 22-1990n - Application for VA Education Benefits Under the National Call to Service (NCS) Program
- VA Form 22-1995 - Request for Change of Program or Place of Training
- VA Form 22-1999c - Certificate of Affirmation of Enrollment Agreement - Correspondence Course
- VA Form 22-1999V - Certification of Delivery
- VA Form 22-5490 - Dependents' Application for VA Education Benefits (Under Provisions of chapters 33 and 35, of title 38, U.S.C.)
- VA Form 22-5495 - Dependents' Request for Change of Program or Place of Training (Under Provisions of Chapters 33 and 35, Title 38, U.S.C.)



VA Forms – VA Beneficiary

- VA Form 22-8691 - Application for Work-Study Allowance
- VA Form 22-8692a - Extended Student Work-Study Agreement
- VA Form 22-8979 – Monthly Verification Form (Chapter 35)



Certifying Charges To VA



Chargeable VS Certifiable

A facility can assess a wide array of charges to its students. With limited exception, the VA does not challenge the facility on what it bills its students for.

There are strict rules on what can and what cannot be certified to the VA for reimbursement though.

SCOs should always remember that they must review all charges assigned to VA beneficiaries, before certifying their enrollment, to ensure they are only requesting charges that are reimbursable.



Equity Of Charges

SCOs must ensure that their facility charges VA beneficiaries equitably with similarly circumstanced non-VA beneficiaries required to pay for the same course.

- This means that the facility cannot charge VA beneficiaries a higher tuition and fees rate than non-VA beneficiaries.
- This means that non-VA beneficiaries cannot routinely get discounts, waivers, or need based scholarships, grants, etc, that are not similarly available to VA beneficiaries.
- Routinely speaking the facility cannot offer absurd grace periods for non-VA beneficiaries to pay off tuition and fees charges and not collect if the non-VA beneficiary does not make their payments.

NOTE: Nothing prohibits a facility from charging VA beneficiaries **less** than similarly circumstanced students. There is no prohibition from Veteran specific scholarships, grants, etc.

Mandatory Tuition And Fees

- **Tuition is defined as:** The actual established charges for tuition that the student is required to pay. Tuition is defined in the facility's catalog (or supplement).
- **Fees are defined as:** Mandatory charges (other than tuition, room, and board) applied by the school for pursuit of an approved program of education. Fees include, but are not limited to, health premiums, freshman fees, graduation fees, and lab fees.
 - Fees do not include study abroad course(s) unless the course(s) is a mandatory requirement for completion of the approved program of education.
 - Fees are defined in the school's catalog or supplement and listed on the school's billing statement or invoice.



Mandatory Tuition And Fees

Examples of fees that are not allowed to be certified include:

- Penalty fees (i.e. late registration, late course changes, returned checks, repeated courses)
- Add/drop course fees
- Fees for any food or lodging expenses, meal ticket fees
- Parking fees that are not required of every student
- Overload fees for course loads that require special permission
- Transportation/transit system fees that are not required of every student

NOTE: If a facility has an “Administrative Fee” the SCO will need to provide a breakdown of what, explicitly, is covered by that fee.



Fees That Don't Apply To A Certified Term

Charges that don't apply to a course being certified cannot be certified to the VA for reimbursement.

- Example 1 – Charges for tests that a student must take to enter into a program cannot be certified for reimbursement.
- Example 2 – For graduate students working on a dissertation, if the student takes multiple terms (for one set of credits) and is charged a fee to continue working on the dissertation in terms after the first – the later terms cannot be certified for any form of reimbursement.
- Example 3 – A student chooses to not have some credits certified to conserve their entitlement (the student takes 12 credits but only asks for 6 to be certified to VA). The facility cannot take the tuition and fees from the non-certified credits and certify them to VA for reimbursement.

NOTE: If a SCO is unsure if a fee is certifiable, then they should contact their [ELR](#) before certifying the fee to VA for reimbursement.

Scholarships, Waivers, And Discounts

Routinely speaking, VA is the “Last Payer”. This means the facility must apply all tuition and fees specific waivers, scholarships, aid, and assistance (other than loans and funds provided under section 401(b) of the Higher Education Act of 1965) before assessing charges to the VA.



In-State VS Out-of-State Charges

Facilities may only certify to VA for In-State charges.

NOTE: the facility may charge the student Out-of-State charges, but may only request reimbursement from VA for In-State charges.

If the facility is approved for the YRP, and a student is being charged Out-of-State charges, the facility may use the YRP to cover the Out-of-State charges.

In-State VS Out-of-State Charges – Public IHLs

Section 702 of [Public Law 113-146](#) created special rules for certifying students for **Public Institutions of Higher Learning (IHL) facilities only**.

This law requires:

- That VA disapprove programs of education for payments of benefits under the Post-9/11 GI Bill and Montgomery GI Bill - Active Duty at a public IHL if the facility charges qualifying individuals tuition and fees in excess of the rate for resident students
- To remain approved for the Post-9/11 GI Bill and MGIB benefits, facilities must charge in-state tuition and fee amounts to “covered individuals” under those two programs.

In-State VS Out-of-State Charges – Public IHLs

A “covered individual” is defined in the Public Law 113-146 as:

- A Veteran who lives in the state where the IHL is located (regardless of formal state of residence) and enrolls in the school within three years of discharge from a period of active duty service of 90 days or more.
- An individual using transferred benefits who lives in the state where the IHL is located (regardless of his/her formal state of residence) and enrolls in the facility within three years of the transferor’s discharge from a period of active duty service of 90 days or more.
- An individual using benefits under the Fry Scholarship who lives in the state where the IHL is located (regardless of his/her formal state of residence) and enrolls in the facility within three years of the Servicemember’s death in the line of duty following a period of active duty service of 90 days or more.



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In-State VS Out-of-State Charges – Public IHLs

To comply with Public Law 113-146:

- Public IHLs must determine a student's eligibility for the resident state requirements.
- Public IHLs are allowed to require additional requirements – but there are limits and they must inform students of those additional requirements.

Primary Takeaway – If a SCO sees that a student meets all the requirements of being a “covered individual” then the SCO must ensure that the student is only **charged** the in-state tuition and fees rate.



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Flat Rate Tuition And Fees Charges

When a VA beneficiary is enrolled in modular terms (i.e. mini-sessions within a standard term) and the facility charges tuition and fees at a flat rate, then the net tuition and fees must be associated and reported with the first credits that total the minimum number of credits required to be a full-time student at the school.



Flat Rate Tuition Charges

Facilities with flat rate tuition must certify modular terms by first dividing the total tuition charged by the minimum number of credits necessary to be considered full-time. The facility will then multiply that per-credit cost by the number of hours of enrollment for each modulated term (until the minimum full-time hours is reached) and then certify the results.

Tuition for future subsequent terms would be reported as “0.00”.



Flat Rate Fee Charges

When a facility has a flat rate tuition schedule the facility must break fees into two categories and follow the specific rules for each category:

1. Flat rate fees (fees that are administrative in nature and are not tied to a specific course – i.e. mandatory parking fees, library fees, etc) will be added into the tuition charges and charged as described previously.
2. Course specific fees (fees that are directly tied to a specific course, such as a lab fee) must be individually added to the term the course is taken.

Tuition Assistance

There are significant differences between Tuition Assistance, Tuition Assistance TOP- UP, and how Tuition Assistance interacts with VA benefits.

- **Tuition Assistance** benefits are a way for the military services to provide education benefits to Servicemembers on Active Duty. Tuition Assistance benefits are administered by each branch of service (each branch determines their own award amounts, eligibility, restrictions, and application process) and are typically earned based on service.
- **Tuition Assistance TOP-UP** was authorized by Public Law 106-398 and allowed VA Education benefits, to cover the out of pocket costs for courses partially paid by Tuition Assistance. Tuition Assistance TOP-UP can only be paid to claimants receiving the Montgomery GI Bill – Active Duty (MGIB-AD / Chapter 30) benefit.
- **Both Tuition Assistance and the Post 9/11 GI Bill (Chapter 33)** benefit can be utilized for applicable courses for approved programs of education.
 - This is not Tuition Assistance TOP-UP.
- **Tuition Assistance cannot be utilized with any VA benefits other than the Montgomery GI Bill Active Duty and the Post 9/11 GI Bill.** Students will have to decide whether they want to utilize VA benefits or Tuition Assistance for those courses.



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Tuition Assistance

- **Post-9/11 GI Bill (Chapter 33) benefit** – The SCO will reduce the tuition and fees by the amount received from the military service Tuition Assistance. All credits can be certified normally.
- **Montgomery GI Bill – Active Duty (TOP-UP)** – The SCO will report out-of-pocket tuition and fees costs not covered by the Tuition Assistance received. All credits can be certified normally.
- **All other VA Education benefits** – The SCO cannot report credits where Tuition Assistance was received for all or part of the tuition and fees for those credits. If Tuition Assistance was not paid for credits taken during a term, those credits can be certified for reimbursement.



Yellow Ribbon Program

Facilities approved for the YRP agree to the following:

1. To provide contributions to eligible individuals who apply for the YRP on a **first-come first-served basis**, regardless of the rate at which the individual is pursuing training in any given academic year;
2. To provide contributions during the current academic year and all subsequent academic years in which the student maintains satisfactory progress, conduct, and attendance;
3. To make contributions toward the program on behalf of the individual in the form of a grant, scholarship, etc.;
4. To state the dollar amount that will be contributed for each participant during the academic year; and
5. To state the maximum number of individuals for whom contributions will be made in any given academic year.



Yellow Ribbon Program

Funds used by the facility for the YRP must be available for unrestricted use by the institution.

Funds provided by third parties that are restricted in their use for specific programs, students or groups, or internal institution funds that are restricted to specific programs, students, or groups shall not be used as all or part of the institution's contribution for the YRP.



Certifying Term Dates



Begin Date

Facilities must report the first scheduled date of classes for any standard term, quarter, or semester in which the student is enrolled.

If the standard term is after April 25, 2016 and a course begins within 7 calendar days then the facility must certify the course using the first day of the term. If a standard term is taken concurrently with a nonstandard term, the two must still be certified separately.

Routinely speaking, the facility should certify the begin date provided on their academic calendar.

**For VA purposes a standard quarter is 10 to 13 weeks in length and a standard semester is 15 to 19 weeks in length with courses beginning the first week and ending the last week, the last day of final examinations. Any term less than, or in excess of, these standards are “non-standard” terms.

End Date

Facilities must report the final scheduled date of classes for all terms, quarters, or semesters in which the student is enrolled.

If the facility has a final exam week, the facility may use the last date that final exams are offered as the student's end date. This date can be used routinely for all students in a standard term (the facility does not have to individually provide different end dates based on when students take their individual final exam).

Routinely speaking, the facility should certify the end date provided on their academic calendar.



Certifying Credits



Prior Credit

The facility is required to review, and properly apply, any prior credit students may have. The facility must have some form of formal documentation that the review for prior credit took place.

The VA cannot obligate a facility to accept prior credit, but the facility must consistently follow its own rules in accepting prior credit (i.e. if the facility accepts military service as a substitute for required electives for a Veteran student not utilizing GI Bill benefits, the faculty must accept military service as a substitute for required electives for Veteran GI Bill beneficiaries).



Course Applicability

All credits certified to VA must be required as part of the students degree or certification.

- Courses which offer credit that do not count towards the number of credits needed to graduate (courses which specifically state the credits don't count towards graduation – normally gym or recreational courses) can never be certified to the VA for reimbursement.
- Audited courses can never be certified to the VA for reimbursement.
- If the facility allows for substitutions of program requirements, VA will allow course substitutions if the facility formally approved the substitution and documents it in the student's file.
- A minor pursued as part of an approved major can be certified, even if the minor will require additional credit(s) to graduate.

In-Residence, Distance, And Hybrid Credits

VA only recognizes “In-Residence” and “Distance” learning modalities. All hybrid courses will be certified as either “In-Residence” or “Distance”.

- **IHL – Undergraduate Resident Training** – In-Residence training for undergraduate students consists of regularly scheduled standard class sessions (at least once every two weeks). The total number of hours of classroom instruction (based on 50 minutes of instruction per hour) must equal, or be greater than, the number of credit hours awarded for the course multiplied by the number of weeks in the term.
 - If a course fails to meet the requirements to be “In-Residence” it must be certified as “Distance”.
- **IHL – Graduate Resident Training** – In-Residence training for graduate students consists of at least two regularly scheduled standard class sessions per term, research (either on or off campus), or a combination of both.
 - If a course fails to meet the requirements to be “In-Residence” it must be certified as “Distance”.



Credit Hours VS Clock Hours

For internships, externships, clinicals, practicums, etc, the faculty can certify the practical training credits as either credit hours or clock hours, whichever is to the student's advantage.

Student Teaching Example: A student takes a 6-credit student teaching course that requires 30-clock hour's attendance a week, certify the course in clock hours. The student is ½-time by credit, but full-time by clock hours. If the SCO certifies clock hours, in remarks the should enter: "Student teaching course measured in clock hours according to M22-4, Part IV, Paragraph 7.09".

Other Practical Training Example: A student takes a 6-credit externship that requires 22-clock hours of practical training per week. If 12 credits are considered full-time for credit based training, and 22 clock hours is considered full-time for clock hour based training, the SCO should certify the course in clock hours.

Credit Hours And Clock Hours

Its possible for a student to take both credit and clock hours during the same term. A course cannot be certified as both clock and credit hours.

Example:

- An undergraduate student (full-time = 12 credit hours) is taking a total of 9 credit hours.
- 3 credit hours are an internship at a local hospital where the student works 15 clock hours per week.

The facility should certify both clock and credit hours (6 credit hours and 15 clock hours) to ensure the student is considered full-time for VA purposes.

The facility should add the following remark in VA-ONCE when certifying both clock and credit hours “Student taking 6 credit hours of lecture courses and a 3 credit, 15 clock hours per week internship”.

Graduate Full-Time Modifiers

When certifying graduate training under the Post-9/11 GI Bill (Chapter 33) benefit, SCOs must report the minimum number of credit hours their academic regulations require to be considered full-time, as published in their catalog, to ensure proper entitlement is charged and appropriate payments are released for any rate of pursuit. In some scenarios, equivalent credit hours need to be calculated and used in determining Rate of Pursuit. In other scenarios, VA will divide the number of credit hours certified by the number of credit hours required to be considered full-time to determine rate of pursuit.

The Long Term Solution (LTS) automatically performs credit hour equivalent calculations for all non-standard terms. These automatic adjustments alter the expected rate of pursuit for students enrolled less than full-time with individually defined full time modifiers, and under values training for terms longer than standard length.

Until LTS is reprogrammed, SCOs may have to add the VBA Standard Remarks; “Graduate non-standard term” in the remarks depending on the scenario.



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Graduate Full-Time Modifiers – Term Definitions

Standard Term - A standard length semester is 15 to 19 weeks and a standard length quarter is 10 to 13 weeks. SCOs must enter the number of published credit hours that his/her school considers to be full time for a standard length semester or quarter for the program the student is pursuing in the TT/FT box. SCOs will not enter remarks in the remarks section for standard terms.

Non-Standard Term - A non-standard length semester is shorter or longer than 15 to 19 weeks and a non-standard length quarter is shorter or longer than 10 to 13 weeks. SCOs must enter the minimum number of hours required for full time, as published in their catalog, in the TT/FT box. Additionally, SCOs must enter the following VBA Standard Remark in VA-ONCE “Graduate non-standard term”. This will off ramp the enrollment for manual processing.

- For any non-standard term that is longer (regardless of whether there is an individually defined FT modifier)
- For short non-standard terms, that have an individually defined FT modifier

Graduate Full-Time Modifiers – Individually Defined Modifier

When a school is approved for VA benefits as semester/quarter and has a calendar published in their catalog that is by VA definition a Non-Standard Term and has a full time modifier associated. This is considered an individually defined modifier.

Example – A school is approved as a semester school and the catalog shows a calendar with 5 terms (all less than 15-19 weeks each) of time with 6 credits being considered full time. This facility would certify 6 in FT/TT box and add the remark.



Graduate Full-Time Modifiers – Using “Graduate Non-Standard Term” Remark

Enter “Graduate Non-Standard Term” in the remarks field for:

- Any non-standard term that is longer (regardless of whether there is an individually defined FT modifier).
- For short non-standard terms, that have an individually defined FT modifier.

The “Graduate Non-Standard Term” will NOT be entered in the remarks field for:

- Standard length terms.
- For short non-standard terms, that DO NOT have an individually defined FT modifier.



Repeated Courses

Credits completed with the necessary passing grades can not be recertified to the VA.

Credits completed that do not meet the necessary passing grade (i.e. the student failed the course or failed to meet major specific passing requirements) can be recertified to the VA.



Remedial Credits

Remedial and deficiency courses are courses designed to correct deficiencies in basic mathematics, English, and reading at the elementary or secondary level.

The facility can certify these courses as part of an approved program, but only for students for whom a verifiable need has been established. The facility must keep test results (or other supplemental evidence) in the student's file to support the student's needs for the remedial course(s).

Remedial and deficiency courses offered through independent study or distance learning are unapprovable and cannot be certified to the VA for GI Bill reimbursement.

Remedial Credits

When submitting remedial credits the facility must certify the remedial credits in the Remedial (“R/D Hrs”) column in VA-ONCE or on the paper form 22-1999.

The facility cannot report these credits in the In-Residence (“Res Hrs”) section.



Transfer Credits

If a VA beneficiary takes courses at a secondary facility that satisfy requirements for their degree, then the degree granting facility is the “Primary” or “Parent” school.

In order for the secondary (“Guest”) school to certify the courses taken at their facility the Primary School must supply them with a structured letter.

Once the letter is received the Guest school will then certify the courses which will transfer to the Primary school.

NOTE: If your facility has multiple facility codes and a student is taking courses at multiple facilities – then formal Primary/Guest letters must be maintained in the VA beneficiary’s file.

Primary School Responsibilities

The Primary school must provide a “Primary School Letter” to the SCO of the Guest school (an email containing the required information can be accepted in lieu of a formal letter). This letter must:

- Identify the student (name, as a student at *<insert name and facility code of Primary school>* pursuing a *<insert name of student’s program>*).
- State that “The courses listed below satisfy *<insert name of program>* requirements and will transfer at full value to *<insert name of Primary school>*”.
- List the courses the student is taking or will take at the secondary school that the Primary school will accept as transfer credit that apply to the student’s program.
- State that “*<Student>* intends to take the above courses at *<Secondary School>* during *<Identify term, for example, fall quarter 2019>*. Please certify the course(s) to VA as the secondary school. VA data and history for both primary and secondary schools will be in VA-ONCE”.

The Primary school SCO must ensure that a transcript is received from the Guest school and that transfer credit is granted (grades permitting).



Example Primary School Letter

NAME AND
ADDRESS OF PRIMARY SCHOOL

Date

NAME AND
ADDRESS OF SECONDARY SCHOOL

<Student's Name (Claim Number)> is a Chapter <e.g., 30> student at <Name of School (facility code)> pursuing a <Name of Program, e.g. B.S. History degree>.

The course(s) listed below satisfy <Name of Program> requirements and will transfer at full value to <Name of School>.

List course(s) by title and number

Student intends to take the above course(s) at <Secondary School> <Identify term, e.g., spring term 2004> as a guest student. Please certify the courses to VA as the secondary school.

SIGNED BY THE CERTIFYING OFFICIAL
TELEPHONE NUMBER



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VA



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Guest School Responsibilities

The Guest school SCO must:

- Add the VA beneficiary in VA-ONCE.
- Certify the student as a “Guest Student”.
 - The name of program will be “Guest Student” and VA-ONCE will require the name of the Primary school.
 - Only the courses listed on the Primary School Letter may be certified. Only mandatory tuition and fees associated with those courses can be certified for reimbursement.
- If required, report all changes in enrollment for the VA beneficiary.



Rounding Out

The facility can certify credits that include non-required courses (or repeat courses the student has successfully completed previously), to allow a student's course load to meet full-time schedule requirements during the student's last term.

Rounding out can only happen during the student's last term and can only be done once per program (so if the student fails a required course, they cannot round out again the following term).

Reporting The Correct Program



Reporting The Correct Program

The SCO must ensure that they are certifying the correct program that the VA beneficiary is taking.

The facility cannot report the student as attending an approved program if the student is actually enrolled in a non-approved program in order to secure funds for the student's attendance in the non-approved program.



Non-Matriculated VS Undeclared

- **Non-Matriculated:** When a VA beneficiary has not yet been formally admitted to the facility as a degree-seeking student.
 - VA education benefits cannot be paid to non-matriculated VA beneficiaries unless they are pending admission to the facility. If they are pending admission, then they can be certified for courses that are required for admission or credits that will count towards the approved major if admitted. No other courses can be certified.
 - VA beneficiaries can only be certified for two quarters or semesters.
 - In VA-ONCE the VA beneficiary's program must be "Non-Matriculated".
- **Undeclared:** When a VA beneficiary has been formally admitted to the facility as a degree-seeking student, but has not yet declared a major.
 - The VA beneficiary cannot be certified beyond their sophomore year unless an approved major is declared.
 - Only "General Education" courses can be certified prior to the VA beneficiary declaring a major.
 - In VA-ONCE the VA beneficiary's program must be "Undeclared".



Reporting Changes In Program

The SCO must report changes of programs (by updating VA-ONCE or the paper 1999 form to reflect the new program) and must keep the formal documentation of the student's change of program in the student's individual file.

If a VA beneficiary changes their program while enrolled in the same facility, the VA beneficiary does not have to submit a "Request For Change Of Program Or Place Of Training" (VA Form 22-1995) or a "Dependents' Request For Change Of Program Or Place Of Training" (VA Form 22-5495).

If the student has previously used benefits at another facility (except as a Guest student), then the student must complete and submit [VA Form 22-1995](#) or [VA Form 22-5495](#) to VA.



Reporting The Correct Facility Code



Reporting The Correct Facility Code

If a facility has multiple Facility Codes they must ensure that they are properly certifying the Facility Code that the VA beneficiary is attending.

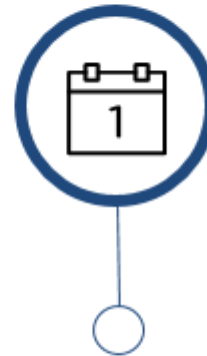


Section 107

Section 107: Calculation of the Monthly Housing Allowance (MHA) under Post-9/11 Educational Assistance Program is based on the location of the campus where the majority of classes are attended



Previously submitted or processed MHA claims impacted by 107 including **payments will be re-adjudicated**



The change will be effective from the date of implementation and will be **retroactive to August 1, 2018**



Choose **VA**

VA



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Section 107

Section 107: VA will pay Housing Allowances based on the location of the campus where classes are attended.



BRANCH CAMPUS

A location of an educational institution that is geographically apart from and operationally independent of the main campus of the educational institution; has its own administration; and offers courses leading to a degree or other recognized education credential.



MAIN CAMPUS

A location where the primary teaching facilities of an educational institution are located.



EXTENSION CAMPUS

VA currently defines “extension campus” as a location of an educational institution that is geographically apart from and is operationally dependent on the main campus or a branch campus of the educational institution.



Section 107

Updates will be made live on **December 1, 2019** and students will be informed via letter with their adjustment status.



WHAT HAPPENS ON DECEMBER 1?

- All Section 107 and 501 updates will be live in processing systems
- System to determine who has received a housing payment since the implementation of Colmery Act Sections 107 and 501



WHAT IS THE IMPACT TO STUDENTS?

- VA will send letters explaining the adjustment process
- Anyone underpaid will receive an adjustment
- Anyone overpaid will not be required to reimburse VA



WHAT DO STAKEHOLDERS NEED TO DO?

- **Be in the know:** Attend subsequent sessions, and keep an eye out for regular correspondence via email, blog posts and FAQ documents
- **Reach out:** Contact us if you have any questions, or suggestions on how to improve communications:
FOREVERGIBILL.VBAVACO@va.gov



SCO Using VA Education Benefits



SCO Using VA Education Benefits

If a SCO is a GI Bill beneficiary, using their GI Bill benefits at the facility where they are working, they are prohibited from certifying their own enrollment certifications, adjustments, amendments, or terminations.



Amendments, Adjustments, And Terminations



Prompt Reporting

The facility must correctly and promptly report all changes (increases, reductions, and terminations) in students' enrollments.

The facility must report all changes in students' enrollments within 30 calendar days from the change in enrollment. The 30 day period begins the date of the change in enrollment, not the date the SCO was notified of the change in enrollment.



Walk Away F Grades

If a facility does not have an attendance policy (and is not required to have one) - Then if a VA beneficiary completes a term with a punitive grade (i.e. an F) assigned, the facility does not need to report the last date of attendance during the enrollment period.

The last date of attendance during a period of enrollment does not need to be reported if a VA beneficiary completes the enrollment period with a punitive grade and does not violate the school's standards of conduct, progress, or attendance during that term.

NOTE: Facilities that have a formal attendance policy **must** enforce that policy.



Changes In Credit Hours – Changes In Certifiable Charges “Increases” And “Reductions”

If a VA beneficiary changes their enrollment (increases or reduces the number of credits taken), then these changes need to be reported to VA.

Not only must the change in credit/clock hours be reported, **the facility must also report the tuition and fees amount for the new number of credits** (i.e. if the VA beneficiary was attending their current course load effective the 1st day of term – the SCO must supply the tuition and fees for that course load).

NOTE 1: When increasing or reducing credits, SCOs must ensure they are properly increasing or reducing the “in-residence” or “distance” credits affected.

NOTE 2: For the Post-9/11 GI Bill benefit (Chapter 33) all changes in enrollment must be reported.

NOTE 3: For Non-Chapter 33 GI Bill benefits (i.e. Chapter 1606, 1607, 30, and 35) changes in credit hours that do not change the student’s training time do not need to be reported (unless the student is a Serviceperson and there is a change in tuition and fees). Changes can be certified if the SCO wishes to submit them.

Withdrawals “Terminations”

VA-ONCE will obligate the SCO to provide a last date of attendance (LDA) which can also be known as an effective date (EFF date).

- If a VA beneficiary officially withdrew, the SCO will enter the date the VA beneficiary withdrew as the effective date.
- If a VA beneficiary is administratively withdrawn or stops attending without officially withdrawing (if the school has an attendance policy or if the student receives non-punitive grades), the SCO must determine and report the VA beneficiary’s last date of attendance.
- If a VA beneficiary completes their term with all “F” grades (if the school has an attendance policy) and/or non-punitive grades, then the SCO must determine and report the actual last date of attendance for each course and, if required, terminate the student for unsatisfactory progress.



Withdrawals “Terminations”

The SCO can use one of the following methods to determine the last actual date of attendance:

1. Attendance Records
2. Grading Reports
3. Last date on which an examination was taken or other papers were filed
4. The last day of activity in the instructor’s records

NOTE: A signed statement from the student as to the last date of their attendance can not be used as the sole means of verifying attendance.

Changes In Certified Tuition And Fees - Flat Rate Tuition and Fees Charges

- If credits are added/reduced to the VA beneficiary's schedule that do not change the term in which the VA beneficiary reaches the number of credits required for full time status; no change to tuition amounts is required but the change in credit hours will still need to be reported.
- If credits are added to the VA beneficiary's schedule that change the term in which the VA beneficiary reaches the number or credits required for full time status; the change in credits and the change in tuition amounts associated with the terms must be reported.
- If the change in credits would alter the VA beneficiary course load to where they are outside the parameters of the flat rate tuition and fees, the tuition and fees must be amended for all affected terms.

These situations can become very complex. SCOs are highly encouraged to review the examples or contact their [ELR](#) prior to certifying these changes to ensure correct processing.

Facility Debts, Student Refunds, And Mitigating Circumstances



Facility Debts

A debt is established on a facility when:

- The VA beneficiary never attended any classes for which they were certified, regardless of the reason for non-attendance.
- The VA beneficiary completely withdrew on or before the first day of the term (FDOT).
- The facility received payment for the wrong student.
- The facility received a duplicate payment.
- The facility submitted an amended enrollment certification, or an Amendment in VA- ONCE, and reported reduced tuition and fee charges, reduced Yellow Ribbon amount, or reduced tuition, fees, and Yellow Ribbon amounts.
- The VA beneficiary died during the term or before the start of the term.
- VA issued payment above the amount certified on the enrollment certification that was used to process the payment (VA data entry error).
- A Compliance Survey finds that tuition and fees was incorrectly certified.

Facility Debts

When a debt is created against a facility the RPO of jurisdiction will send the facility a letter notifying the school of the overpayment and detailing the associated VA beneficiary, the debt amount, and the reason for the creation of the debt. The debt will electronically be submitted to VA's [Debt Management Center \(DMC\)](#) and DMC will issue the first Notice of Indebtedness (NOI) to the facility.

SCOs should NOT attempt to refund monies to the VA until they have received the DMC letter.

The debt letter from DMC will provide instructions on how to refund monies to the VA. The methods of returning monies to VA can also be found the [School Certifying Official Handbook](#).



Disputing Facility Debts

In order to dispute a debt, the facility must contact DMC.

The best way to submit a dispute is to email DMC at dmcedu.vbaspl@va.gov.

Facilities may also call DMC's toll-free number (1-800-827-0648) and speak to a customer service representative.



Refunds

The facility must enforce its refund policy.

- Accredited facilities – have the authority to create their own refund policy, though they must equally enforce that refund policy for all students.
- Non-Accredited facilities – the facility must have and enforce a refund policy that is equal to or better than the pro-rata refund policy required by [38 CFR 21.4255](#). Changes to this refund policy must be reported and approved by the [SAA](#) of jurisdiction.

NOTE: The facility must follow their normal refund policy. The facility cannot obligate VA beneficiaries to provide their VA debt letter and then refund only that amount. The facility must refund VA beneficiaries in accordance with their written and approved refund policy.

Mitigating Circumstances

The law prohibits payment of VA benefits for a course from which a VA beneficiary withdraws and received a grade that will not be used in computing requirements of graduation ([38 United States Code \[USC\] 3680 \[a\] \[3\]](#)).

The purpose of the original legislation creating these rules was to curb abuse of VA educational assistance programs by certain students who were using the non-punitive grading and liberal withdrawal policies of some schools to receive VA benefits for several terms without making any academic achievement. Therefore, Congress directed VA to enforce the restrictions of 38 USC 3680 (a) (3) in a manner that would eliminate federal payments to students who were not seriously pursuing an education.



Mitigating Circumstances

Mitigating Circumstances: circumstances beyond the individual's control that prevent him or her from continuously pursuing a program of education. ([38 Code of Federal Regulations \[CFR\] 21.9505](#)).

Examples of mitigating circumstances include:

1. An illness or mental illness of the individual
2. An illness or death in the individual's family
3. An unavoidable change in the individual's conditions or employment
4. Immediate family or financial obligations beyond the control of the individual that require him or her to suspend pursuit of their program of education to obtain employment
5. Unanticipated difficulties in caring for the individual's child or children
6. Discontinuance of the course by the educational institution

Mitigating Circumstances

Mitigating circumstances need to be reported when:

- When a student terminates or reduces after the drop-add period; and
- A non-punitive grade is assigned.

If mitigating circumstances are an issue and the student or school does not submit adequate evidence of mitigating circumstances with a report of reduction, withdrawal, or assignment of non-punitive grades, VA will not pay for the course (or courses) in question.

A VCE will adjust the students record by withdrawing the affected credits **effective the first day of term** and will create all appropriate tuition and fees, Yellow Ribbon, books and supplies, and MHA debts.



Mitigating Circumstances

In order to grant mitigating circumstances a VCE must be able to answer three questions and have adequate evidence to substantiate the submitted mitigating circumstances. The questions the VCE must be able to answer are:

- What occurred?
- Was the occurrence unavoidable?
- What was the impact of this event?

NOTE: In instances where the specific mitigating circumstance is of a sensitive nature, it would be insensitive to insist on the submission of corroborative evidence. In these specific cases, a VCE can automatically accept just the student's statement and grant the mitigating circumstances. Some examples of this include:

- The student reports the death of a spouse or child
- The student reports a serious illness of an immediate family member
- The student reports that family or financial obligations outside of the student's control required the student to stop attending school in order to obtain employment

NOTE: There is no set standard of evidence for what is required when a student requests mitigating circumstances. It is highly dependent on the individual student's situation. If student's have a question about what evidence is needed, they should contact the VA directly.

Evidence to substantiate mitigating circumstances must be provided directly to VA. It can be supplied in the following ways:

- It can be mailed to the Regional Processing Office (RPO) of jurisdiction. The mailing address can be found on the [GI Bill Website](#); or
- It can be submitted online through the [Internet Inquiry System](#)

Mitigating Circumstances

SCOs do not have to report mitigating circumstances for VA beneficiaries.

A facility may act as an agent for the VA beneficiary when reporting mitigating circumstances though. If a facility reports the reason for the VA beneficiary's reduction or withdrawal, the VA will consider the statement as coming from the VA beneficiary.

This does not supersede VA's need for evidence. When evidence is required, it still must be supplied to the VA.

If it is a sensitive case, where evidence is not required, and a SCO reports the mitigating circumstances to VA – they should retain the student's statement (letter, email, signed statement, etc.) in the student's file. This will be reviewed during a Compliance Survey.

NOTE: If evidence is required to substantiate mitigating circumstances – VA will develop directly to the student for this information.



Mitigating Circumstances

SCOs can do the following to help VA beneficiaries report mitigating circumstances:

- When applicable, identify reductions or withdrawals as mitigating circumstances on the VA Form 22-1999b (or through the electronic version of the VA Form 22-1999b via VA-ONCE).
- Provide information to VA beneficiaries about reductions, withdrawals, or assignment of non-punitive grades. When possible, making sure VA beneficiaries are fully informed of possible consequences when reducing or terminating outside of the drop-add period.
- Assist VA beneficiaries submit mitigating circumstance documentation and evidence. Provide VA beneficiaries with the information listed on the previous slides, or direct them to our VA Call Center at 888-442-4551 for claim specific assistance.



Reporting Academic Probation, Academic Suspension, And Graduation



Reporting Academic Probation

Facilities that have an academic progress policy which allows for a period of academic must notify VA promptly when a VA beneficiary is placed on academic probation.

When reporting academic probation the facility should utilize the [Internet Inquiry System](#).

Procedures for reporting Academic Probation is found in the [School Certifying Official Handbook](#).

Reporting Academic Suspension

When a student is academically suspended the facility must report the academic suspension to VA by reporting it as a termination using the standard remark “Unsatisfactory Attendance, Conduct, or Progress”.

NOTE: If a student successfully petitions the dismissal and is readmitted, then the facility must annotate the student’s file (but does not have to provide additional information to VA).

Procedures for reporting Academic Suspension is found in the [School Certifying Official Handbook](#).

Reporting Graduation

Effective June 12, 2018 IHLs and NCDs were formally required to report academic progress (graduation) to VA.

The “Outcome Measures – Frequently Asked Questions” released June 12, 2018 clarifies:

- That the obligation to report graduation is technically limited to the obligation to report graduation for Post-9/11 GI Bill benefits (Chapter 33).
- There is no formal obligation for facilities to report graduation of Non-Chapter 33 beneficiaries. While there is no formal requirement, facilities are highly encouraged to report graduation to VA.

Facilities can only report graduation for VA beneficiaries who are receiving education benefits at the time of graduation. If a VA beneficiary exhausted their benefits prior to the term in which they graduate, then the facility should not report graduation for that student.

Annual Reporting Fees



Annual Reporting Fees

A Reporting Fee is a payment made from the VA to a facility based on the number of VA beneficiaries who were certified to VA at least once during the year and who received VA educational benefits.

The payment rate for Reporting Fees fluctuates annually based on legislation.

[38 United States Code \(USC\) 3684 \(c\)](#) mandates that Reporting Fees must be used for the purpose of certifications or otherwise supporting programs for Veterans. This money is to help schools cover the cost of administering their VA programs including, but not limited to, attendance at VA sponsored training conferences.

Facilities must document how they use their Reporting Fees (a formal ledger, receipts to/from a SCO training conference, invoices for equipment for the facility's Veteran Center, formal documentation the school used the Reporting Fees as part the SCOs salary, etc.).

Annual Reporting Fees

Public Law 115-48 (Section 304) mandates that facilities who receive Reporting Fees for 100 or more eligible VA beneficiaries cannot use the fees for, or merge them with, the school's general fund.

The facility is required to have documentation that the Reporting Fees are not merged with any other fund at the school.

Approval Compliance



Facility Changes

If there are changes to a facility (i.e. it moves, its accreditation status changes, there is a change in ownership, etc) or its approved programs (i.e. change in the length of the program, change of the full-time modifier, change in any piece of it being contracted out, etc) – the change must be reported to your SAA immediately (preferably before the change goes into effect).

Failure to report changes could have profound negative impacts (especially if the changes make it so the program is no longer eligible for VA aid). If there are changes to the facility or approved program – all certifications for the changed facility or program must be held until explicit SAA approval is received.

Standards of Progress – Satisfactory Progress and Conduct

A condition of approval for IHLs and NCD facilities is that the facility has and enforces standards of progress relating to student’s satisfactory progress and conduct.

This means that there must be a specific period (not a “may”) where a VA beneficiary will have their VA education benefits terminated due to failure to meet standards of progress and conduct.

Standards of Progress – Attendance

A condition of approval for **non-accredited** facilities is that the facility has and enforces standards of progress relating to VA beneficiary's attendance.

It is optional for **accredited** facilities to have standards of progress relating to VA beneficiary attendance. If the facility does have standards of progress relating to VA beneficiary attendance, then the facility must enforce them.

Contracted Courses

Any program where the program is contracted (in whole or part) to a third party entity must be specifically approved by the SAA.

The entity the facility is contracted with must also be approved for VA benefits.

If a facility provides contracted training without the specific approval of the SAA of jurisdiction, and the SAA cannot retroactively approve the contract, all certifications submitted for the contracted program must be terminated and the student debt may be referred for potential School Liability.

Assessing Late Fees Or Disenrolling VA Beneficiaries

Effective August 1, 2019 [Public Law 115-407 \(Section 103\)](#) obligates the following:

- That facilities must have “a policy that permits any covered individual to attend or participate in the course of education during the period beginning on the date on which the individual provides to the educational institution a certificate of eligibility for entitlement to educational assistance under chapter 31 or 33 of this title and ending on the earlier of the following dates:
 - i. The date on which the Secretary provides payment for such course of education to such institution.
 - ii. “(ii) The date that is 90 days after the date on which the educational institution certifies for tuition and fees following receipt from the student such certificate of eligibility.”

**A “covered individual” is any individual who is entitled to educational assistance under Chapter 31 or 33.

Assessing Late Fees, Deny Services, Or Disenrolling VA Beneficiaries

Effective August 1, 2019 [Public Law 115-407 \(Section 103\)](#) further obligates the following:

- That facilities must have “a policy that ensures that the educational institution will not impose any penalty, including the assessment of late fees, the denial of access to classes, libraries, or other institutional facilities, or the requirement that a covered individual borrow additional funds, on any covered individual because of the individual’s inability to meet his or her financial obligations to the institution due to the delayed disbursement of a payment to be provided by the Secretary under chapter 31 or 33 of this title.”

Commissions and Bonuses For Recruiters

A condition of approval for IHLs and NCD facilities is that a program cannot be approved for GI Bill benefits if the facility provides any commission, bonus, or other incentive payment based directly or indirectly on success in securing enrollments or financial aid to any persons or entities engaged in any student recruiting or admission activities or in making decisions regarding the award of student financial assistance.



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Advertising Materials

Facilities cannot use advertising materials that could be construed as erroneous, deceptive, or misleading.

Possible examples may include:

- **“Our program has a 100% job placement rate”**
 - Job placement rates must be verifiable based on objective evidence. If a facility cannot verify this 100% placement rate, the advertising would be deemed erroneous and misleading. SAA or VA officials can ask for the supporting evidence at any time. Providing this evidence is a requirement of maintaining approval to receive VA benefits.
- **“We are VA Approved!”**
 - No facility is VA approved (VA does not advocate for any specific facility). Facilities are approved to receive VA benefits.
 - Correct verbiage would be “approved to receive reimbursement through GI Bill® benefits”.
- **“Become a Nurse with this certificate course...”**
 - This would be misleading advertising if a course lacks programmatic accreditation. Advertising cannot be erroneous, deceptive, or misleading - by actual statement or omission.

GI Bill® Trademark

Facilities must utilize the GI Bill trademark and attribution statement anytime they utilize the term “GI Bill”. This includes all print, electronic, radio, digital and other forms of media.

Attribution Statement = “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 Web site at <https://www.benefits.va.gov/gibill>.”

The trademark and attribution statement must be utilized on each individual webpage where the term is used. It cannot be provided only once on a website.

In-depth rules for the GI Bill Trademark can be found on the [GI Bill website](#).

Department Of Defense Seals

The Department of Defense (DoD) has specific rules and regulations around use of the seals of each of the Military Services.

VA highly encourages all facilities to review DoD's guidance on the military seals before utilizing them in any way.

In-depth information about the DoD Seals can be found on the [DoD Website](#).

GI Bill Feedback System, GI Bill Comparison Tool, And Priority Enrollment



GI Bill Feedback System

<https://www.benefits.va.gov/GIBILL/Feedback.asp>

VA beneficiaries or 3rd party entities are able to provide information to the VA about potential approval violations or unethical practices of facilities approved to receive reimbursement through GI Bill benefits.

General information about complaints filed through this system may be seen on the GI Bill Comparison Tool.



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GI Bill Comparison Tool

<https://www.vets.gov/gi-bill-comparison-tool>

This is a resource for VA beneficiaries to review facilities that have been approved to receive reimbursement through the GI Bill benefits.



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Priority Enrollment

Priority enrollment is defined as a student being able to register early for classes earlier than other students. It should not be interpreted to mean that the student is allowed to register before ALL other groups of students.

Example: All seniors are allowed to register for classes, then all Veteran/Servicemember students, then all juniors, then all sophomores, then all freshmen. Because Veteran/Servicemember students can apply before other groups, they are eligible for priority enrollment.

Priority enrollment is **not** a condition of approval, and failure to report the existence of a priority enrollment policy is **not** a Compliance Survey discrepancy or grounds for suspension or withdrawal of program approval.

Priority Enrollment

Facilities with priority enrollment policies for Veterans/ Servicemembers will need to provide Approval, Compliance, and Liaison personnel with a printout of their course catalogs or catalog addenda showing the priority enrollment policy.

- Prior to August 1, 2019, facilities should notify Approval, Compliance, and Liaison personnel that they offer priority enrollment by sending an email to Priority.enrollment.vbabuf@va.gov and attaching a printout of the priority enrollment policy.
- Beginning August 1, 2019 facilities should notify their **ELR** of jurisdiction directly and no longer use the Priority.enrollment.vbabuf@va.gov mailbox.



Work-Study



Work-Study Program Eligibility

VA work-study is available to VA beneficiaries training on a full-time or $\frac{3}{4}$ time basis and is receiving benefits under one of the following programs:

- Chapter 33
- Chapter 30
- Chapter 1606
- Chapter 32
- Chapter 35
- Chapter 31

Application information can be found on the [GI Bill website](#).

Schools interested in applying for VA work-study students should review the Work-Study Site-Supervisory Handout.

NOTE: work-study are a supplement to VA education benefits and is nontaxable.

Work-Study Program Contracts

A work-study student cannot begin working before (whichever is later):

- Their contract is approved; or
- The start of their contract

NOTE: Hours worked prior to the approval date or the beginning date of their contract cannot be paid.



Work-Study Time Cards

- Time Records may be submitted every 50 hours or every two weeks, whichever comes first.
- Hours to be paid should be kept cumulative and on the correct time record for the entire contract period.
- The time record must be initialed by both the student and the Site Supervisor.
- Time records should be completely filled out before starting a new time record.
- Zero-Hour Time Records must continue with cumulative hours from previous time records.

NOTE: Once a time record has been processed, the student can usually expect a deposit within about 3-5 business days if the student uses direct deposit or 7-10 business days if the student receives a paper check.



Other Topics Of Interest



Other Topics Of Interest

- 85/15 Rule



Questions



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