



**Education Service  
School Certifying Official Training  
Certification Process for Non-College Degree  
Programs**



# Approved SCO Training

Slide 2

**This is approved SCO Annual Training!**

Participants will earn 1-hour credit toward their annual training requirement if they...

- Sign-in on the Session Attendance Sheet
- Remain in the training for the duration of the session
- Log onto the SCO Training Portal
- Self-certify they completed the conference training
- Print the certificate and keep for their records



**THE MODERATOR WILL PROVIDE THE MENTI CODE!**



## Ice Breaker



How many F's are in the sentence below:

FINISHED FILES ARE THE RESULT OF YEARS OF  
SCIENTIFIC STUDY COMBINED WITH THE EXPERIENCE OF  
YEARS.



## Ice Breaker



How many F's are in the sentence below:

FINISHED FILES ARE THE RESULT OF YEARS OF  
SCIENTIFIC STUDY COMBINED WITH THE EXPERIENCE OF  
YEARS.



# Learning Objectives

**Upon completion of this module, you should be able to:**

- Describe the methods for measuring courses at an NCD facility
- Identify policies that must be followed for certifying benefits at an NCD facility
- Describe the Certification Processes for VA Education Benefits
- Identify the documentation needed for Compliance Surveys





# Topics

- **Measurement of Courses**
- **Policies**
- **How to Certify**
- **Compliance Surveys**



## Measurement of Courses



# Measurement of Courses (1 of 2)

## Clock Hours

Actual hours per week a student spends attending class or other instructional activities that count toward completing a program of study.

- Complete 18 clock hours per week if the predominant portion is spent in the classroom
- Complete 22 clock hours per week if the predominant instruction is more like shop practice

## Credit Hours

The number of credits a student receives for enrolling in, and successfully completing a given course.

- Students complete a certain number of credits to complete a program
- **Does not** directly reflect the total number of a student spends in class
- Reflect each course's workload



## Measurement of Courses (2 of 2)

- Clock hour are always 60 minutes of net instruction.
- Non-College Degree (NCD) programs utilize Clock Hours to measure courses
- Contact your State Approving Agency (SAA) of jurisdiction for questions about your program.





# What Exactly is a Clock Hour?

## Classroom Theory:

- Clock Hour is a 60-minute time-frame
- 10 minutes to change classes each hour
- 10 minutes to change subjects if in the same classroom

## Shop Practice:

- Clock Hour is a 60-minute time-frame
- Two (2) 15-minute breaks (Morning & Afternoon)
- Shorter breaks allowed for part-time enrollment





# How the Difference Affects the Payment of Benefits

## Certifying Classroom Theory vs. Shop Practice

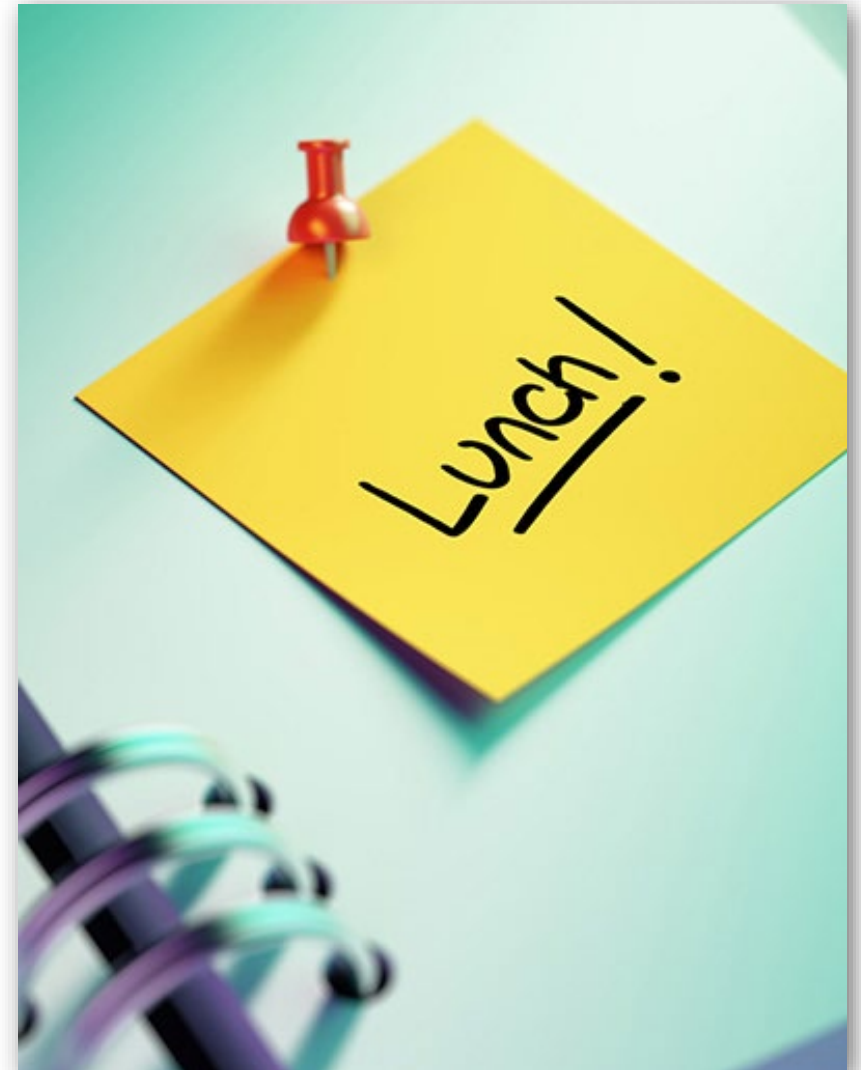
CLASSROOM THEORY		SHOP PRACTICE	
Clock hours net instruction per week	Training Time	Clock hours net instruction per week	Training Time
18+	Full-time	22+	Full-time
13 – 17	$\frac{3}{4}$ -time	16 – 21	$\frac{3}{4}$ -time
09 – 12	$\frac{1}{2}$ -time	11 – 15	$\frac{1}{2}$ -time
05 – 08	Less than half; more than $\frac{1}{4}$ -time	06 – 10	Less than half; more than $\frac{1}{4}$ -time
01 – 04	$\frac{1}{4}$ -time	01 – 05	$\frac{1}{4}$ -time



## Lunch and Meal Breaks

All clock hours reported to VA must exclude any lunch or meal breaks.

The morning and afternoon breaks in predominantly shop practice, may not be combined for a half hour lunch.





## Rate of Pursuit



- Rate of Pursuit (RoP) is determined by VA.
- Direct students to GI Bill website or Education Service Call Center (888.442.4451) for assistance.



## Credit Hours

NCD programs offered on a term basis in credit hours:

- Are certified as they would be in a degree program
- Consist of individual unit subjects pursued consecutively
- Are certified based on the school's published calendar term dates



## Section Review

A clock hour is always defined as 60 minutes of net instruction.

- ☐ True
- ☐ False



## Section Review

A clock hour is always defined as 60 minutes of net instruction.

- ☐ True
- ☐ False



## Section Review

Which statement is the most accurate about credit hours?

- ☐ A. Credit hours reflect the total number of hours per week a student spends in class.
- ☐ B. Credit hours refer to the number of credits a student receives for enrolling in, and successfully completing a given course.
- ☐ C. A credit hour is always defined as 60 minutes of net instruction.
- ☐ D. All credit hours reported to VA must exclude any lunch or meal breaks.



## Section Review

Which statement is the most accurate about credit hours?

- ☐ A. Credit hours reflect the total number of hours per week a student spends in class.
- ☒ **B. Credit hours refer to the number of credits a student receives for enrolling in, and successfully completing a given course.**
- ☐ C. A credit hour is always defined as 60 minutes of net instruction.
- ☐ D. All credit hours reported to VA must exclude any lunch or meal breaks.



## Policies



## Policies: Attendance Policy (1 of 2)



Students with unusual attendance problems should consider leave of absence.

Situations such as:

- Absences due to an extended illness
- Very frequent medical appointments
- Issues causing them to fall below the attendance policy



## Policies: Attendance Policy (2 of 2)

If a program is measured in clock hours, benefits are paid based on clock hours of attendance per week.

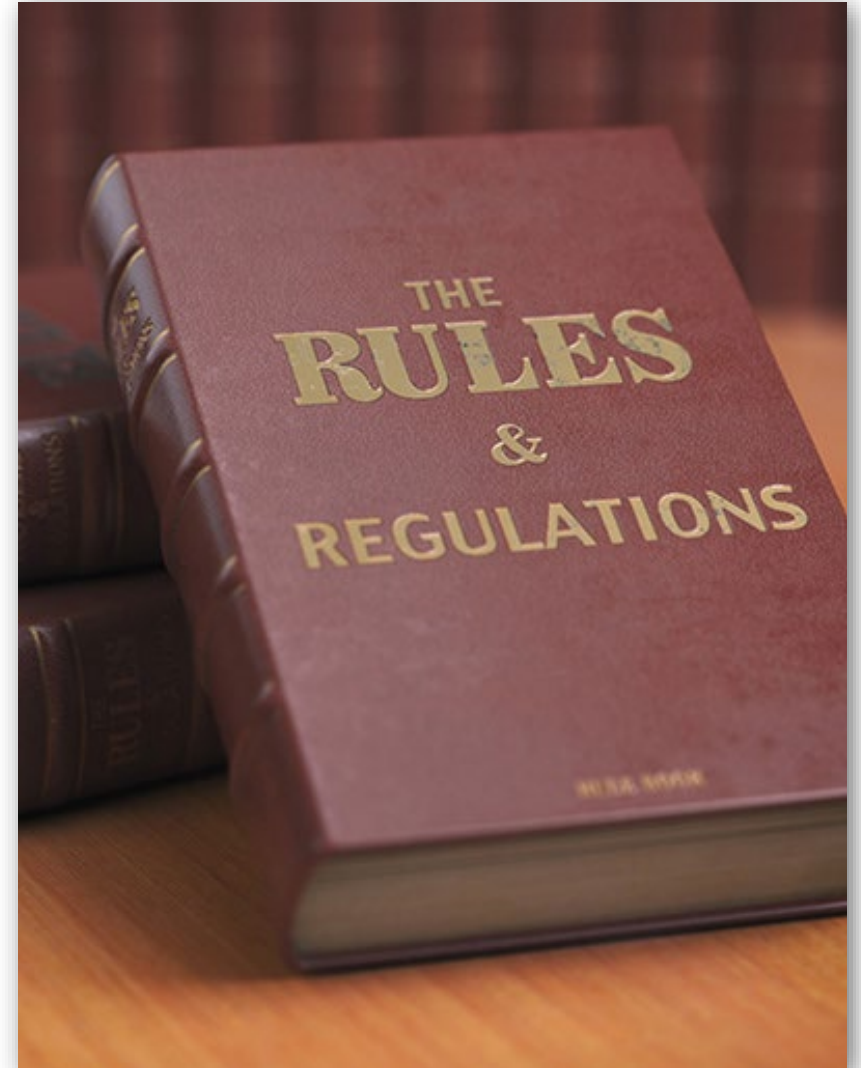
You **may not** extend the certified end date for students due to absences.





## Policies: Standards of Progress (1 of 3)

- Both accredited and non-accredited schools must enforce Standards of Progress (SOP) and conduct
- Only **non-accredited schools** are required by federal law to have attendance standards





## Policies: Standards of Progress (2 of 3)

SOP, conduct and attendance guidelines must be in the school's catalog or bulletin and define:

- The grading system
- The minimum satisfactory grade level
- Conditions for unsatisfactory grades or progress
- A description of any probationary period
- Conditions for re-entrance after dismissal for unsatisfactory progress
- Conditions for dismissal due to unsatisfactory conduct
- The attendance policy





## Policies: Standards of Progress (3 of 3)

### Academic Probation

If there's a failure to adhere to SOP, list the termination date as:

- The last day of term in which progress became unsatisfactory
- The date the SOP resulted in the inability to attend





# Policies: Credit for Prior Training & Credit Evaluation

## Credit for Prior Training

- Transfer courses
- Credits
- Previous experience

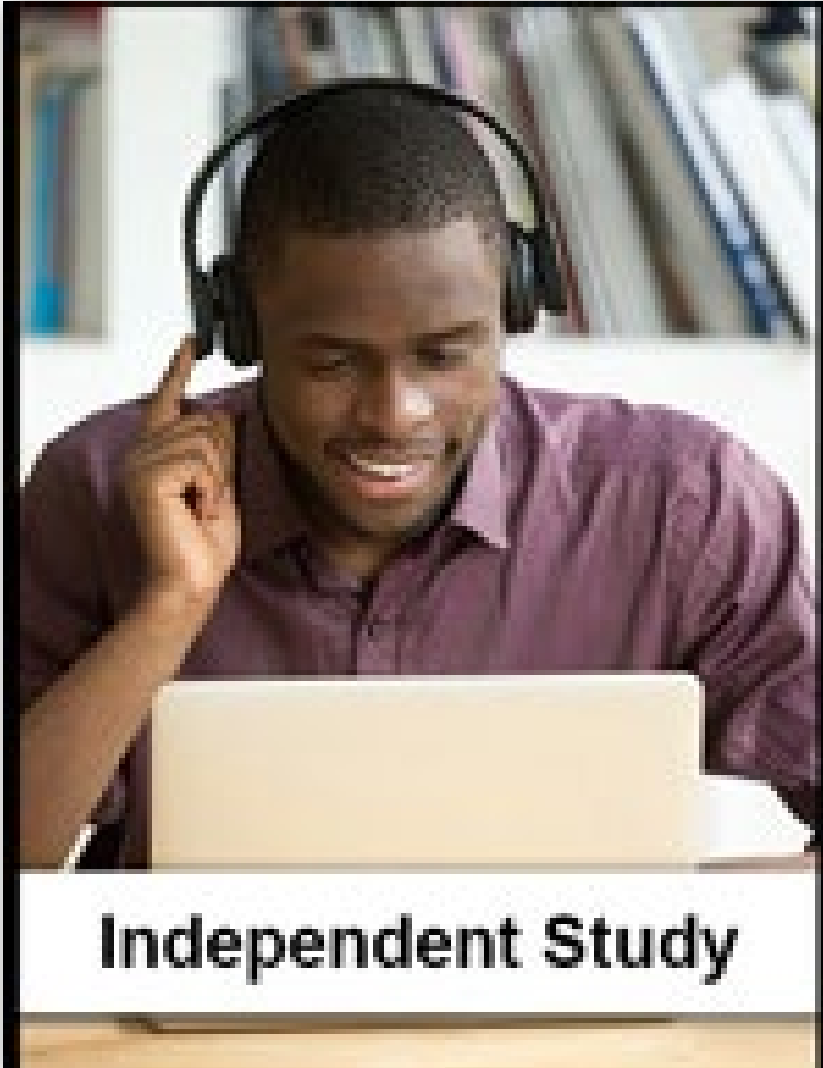
## Credit Evaluation

- Completed when students enroll or change programs
- Reviewed by VA during compliance surveys





## Independent Study



Independent Study and Hybrid/Blended courses that do not meet resident training requirements is distance learning .

### *NCD Facilities*

**Cannot** certify a student if any part of the program is independent study.

### *Improper Certifications*

Can result in suspension (or withdrawal) of your sites approval to receive GI Bill benefits



## Policies: Length of Courses



Improper certification of the length of your program can result in payments being denied.

*The Exception:*

Students repeating a distinct module that was formally failed.



## Policies: Refund Policy



### **Non-Accredited Facilities**

- Must meet the Pro Rata requirements of 38 CFR 21.4255

### **Accredited Facilities**

- Satisfy your accrediting agency

### **All Facilities**

- Correct and prompt
- Mandatory



## Section Review

One of the criteria for approval of any school for Veterans' training is that it reviews prior credit and grants credit as appropriate to a VA student's current program.

- ☐ True
- ☐ False



## Section Review

One of the criteria for approval of any school for Veterans' training is that it reviews prior credit and grants credit as appropriate to a VA student's current program.

- ☐ True
- ☐ False



## Section Review

Non-accredited schools are required by federal law to have attendance standards. What should be defined within them? (Select the answer that best applies.)

- ☐ A. The school's grading system.
- ☐ B. Conditions for interruption of training due to unsatisfactory grades or progress.
- ☐ C. A description of any probationary period.
- ☐ D. Conditions for dismissal due to unsatisfactory conduct.
- ☐ E. All of the above.



## Section Review

Non-accredited schools are required by federal law to have attendance standards. What should be defined within them? (Select the answer that best applies.)

- ☐ A. The school's grading system.
- ☐ B. Conditions for interruption of training due to unsatisfactory grades or progress.
- ☐ C. A description of any probationary period.
- ☐ D. Conditions for dismissal due to unsatisfactory conduct.
- ☐ **E. All of the above.**



## Policies: Mandatory Charges

If there's **one** exception, the charge isn't mandatory and therefore not reimbursable.

### *Example of a mandatory fee:*

- A parking fee assessed to all students
- A specific cosmetology kit purchased in full from your facility without exception

### *Example of a non-mandatory fee:*

- Parking fee assessed to only students with cars
- A cosmetology kit purchased in components from 3rd party and given credit for those components



## Policies: VA as the Last Payer

Last Payer – Facility applies tuition-only specific waivers, scholarships, aid, and assistance before charging the VA.

Some state specific funds are exempt from this obligation.





## Policies: Reporting Fees

Covers the cost of administering VA programs.

The payment:

- Is made from VA to a school
- Is based on the number of students certified to VA at least once during the year and received VA educational benefits
- Is used for certifications or supporting programs for Veterans
- May include attendance at VA sponsored training conferences
- Fluctuates annually





## Policies: Reporting Fee Changes

Effective August 1, 2018:

- The payment rate for Reporting Fees was set to \$15.00
- Calendar year 2018 Fees will be paid in 2019
- There's no longer a separate higher Reporting Fee payment rate for students using advanced pay





## Policies: The 85-15 Rule (1 of 10)

Prohibits benefits to students where 85% or more have any portion of their fees paid by school or VA.

### *Ratio:*

If Supported students to Non-supported students exceeds 85% at the time a new VA student enters or reenters, the student cannot be certified.

### *Exemptions:*

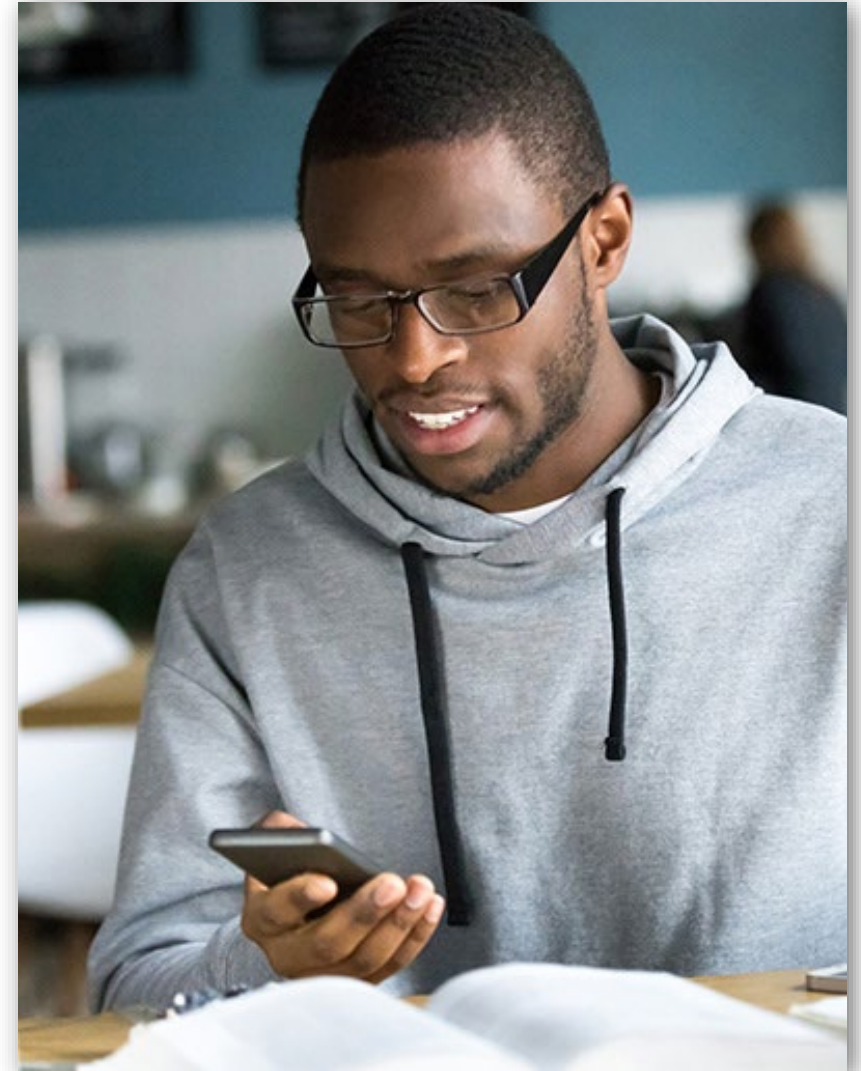
Doesn't apply to students receiving Chapter 31 or Chapter 35 benefits.



## Policies: The 85-15 Rule (2 of 10)

### Non-Supported Students:

- Non-Veterans, Servicemembers or Reservists and not in receipt of institutional aid
- Students in receipt of any Federal aid
- Undergraduates and non-college degree students receiving any assistance
- All graduate students in receipt of institutional aid

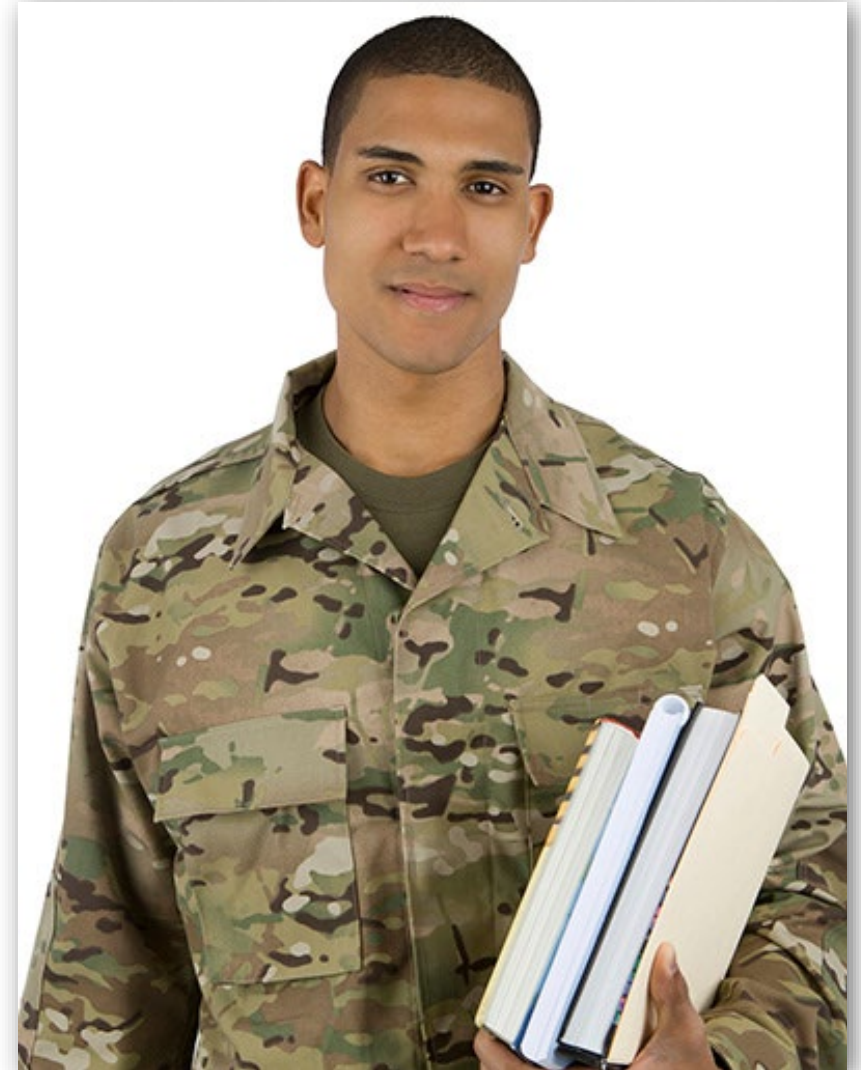




## Policies: The 85-15 Rule (3 of 10)

### Supported Students:

- Veterans, Servicemembers, Reservists, or dependents who are in receipt of VA benefits
- All students receiving institutional aid





## Policies: The 85-15 Rule (4 of 10)

When calculating the 85-15 Rule:

1. The school must ensure they are calculating the 85-15 Rule computations for their specific facility.





## Policies: The 85-15 Rule (5 of 10)

When calculating the 85-15 Rule: *(continued)*

2. The school must break students into individual programs
  - a) Computations are by program, not individual classes
  - b) A track will vary in its predetermined and identified educational objectives
  - c) Different equipment may result in a difference in training
  - d) If the case above, two students would be enrolled in separate programs for approval purposes

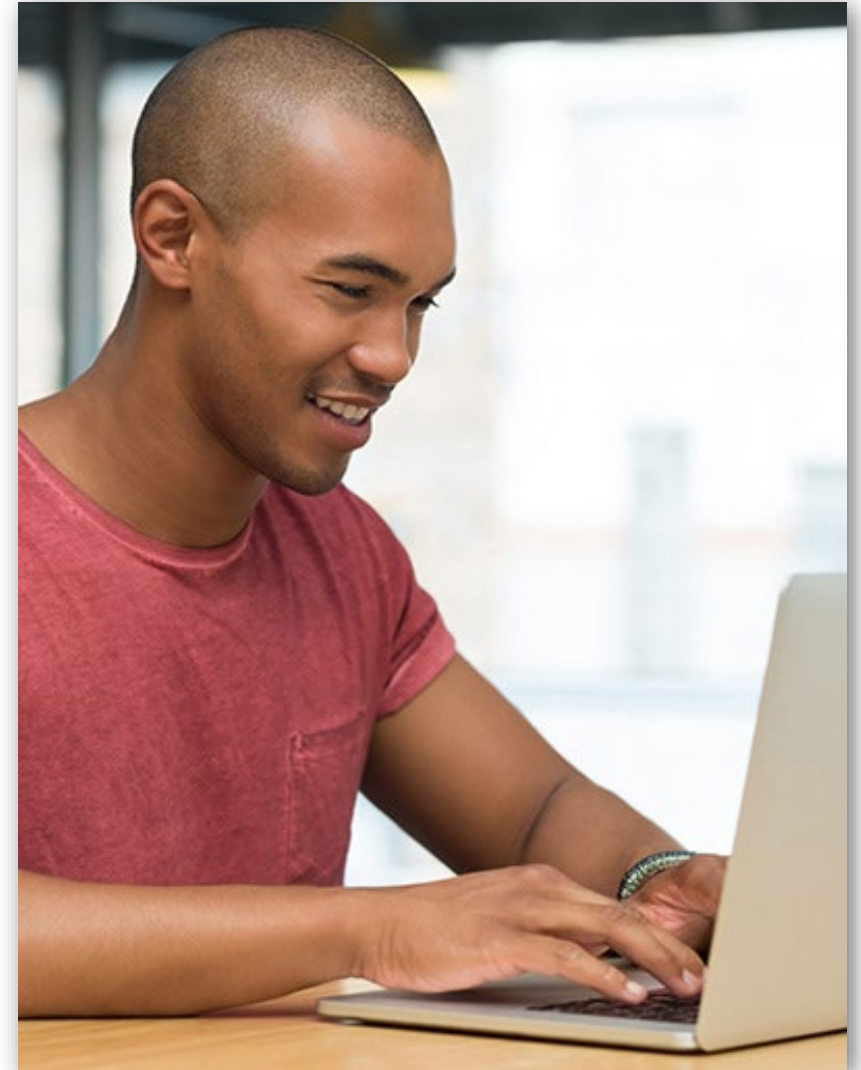




## Policies: The 85-15 Rule (6 of 10)

### Final Calculations

- Supported Students are added to the number of Non-supported Students for a Total Number of Students
- Supported Students are divided by Total Number of students then converted into a percentage
- If percentage is less than or equal to 85%, school's compliant





## Policies: The 85-15 Rule (7 of 10)

Part-time students are converted to a full-time equivalent number by multiplying the number of part-time students by:

- Students receiving Chapter 33 benefits: RoP
- Students receiving any VA benefit other than Chapter 33: the students' individual training time

For Example:

Number of Students	Individual Training Time or Rate of Pursuit	Calculation	Full Time Equivalent Number of Students
20	.25	$20 * .25$	5
15	.5	$15 * .50$	7.5
10	.75	$10 * .75$	7.5
These 45 part-time students equate to a total of 20 FTE which must be added to the total full-time number of either Supported or Non-Supported Students.			



## Policies: The 85-15 Rule (8 of 10)

NCD programs are structured on a term basis where terms may overlap each another.

### Term 1 – 1/1/19 – 7/1/19

The school reviews rule to ensure the Supported Student population is complainant.

- Five (5) students using GI Bill (Supported)
- One (1) self-paying (Non-supported)
- The 85-15 calculation is 83.33%

### Term 2 – 2/1/19 – 8/1/19

New and still enrolled students from prior term must be in the calculation.

- Two (2) new self-pay students (Non-supported)
- Four (4 ) new GI Bill students (Supported)
- Total – Nine (9) Supported & Three (3) Non-supported
- The 85-15 calculation is now 75%



## Policies: The 85-15 Rule (9 of 10)

NCD programs are structured on a term basis where terms may overlap each another.

### Term 3 – 3/1/19 – 9/1/19

New and still enrolled students from Terms 1 and 2 factored into the calculation.

- Three (3) new GI Bill students (Supported)
- One (1) self-pay (Non-supported)
- Non-supported student from Term 1 drops
- Total – 12 Supported & Three (3) Non-supported
- The 85-15 calculation is 80%

### Term 4 – 4/1/19 – 10/1/19

New and still enrolled students from Terms 1, 2 and 3 must be factored into the calculation.

- 0 new self-pay (Non-supported)
- Two (2) new GI Bill students (Supported)
- Total – 14 Supported & Three (3) Non-supported
- The 85-15 calculation is now 82.35 %



## Policies: The 85-15 Rule (10 of 10)

If a program has failed to comply with the 85-15 rule:

- Enrollments and reenrollments will be suspended
- The school will be informed that all further enrollments are suspended
- **Do not** submit enrollment certifications for on or after suspension date
- **Do** submit certifications for those already enrolled, previously paid, and have been continuously enrolled
- **Do** submit all enrollments changes (reductions, terminations, etc.)





## Policies: 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.





## Section Review

What are the rules that apply to the 85-15 policy. (Select all the answers that apply.)

- ☐ A. Enrollments and reenrollments will be suspended for the out of compliance program effective the date that the ratio exceeded 85% of supported students.
- ☐ B. The number of Supported Students is added to the number of Non-supported Students for a Total Number of students. The number of Supported Students is then divided by the Total Number of students and converted into a percentage.
- ☐ C. You only have to count the current students and new students for this policy. The schools do not have to consider prior terms.
- ☐ D. Students receiving Vocational Rehabilitation and Employment (Chapter 31) or Survivors' and Dependents' Educational Assistance (Chapter 35) benefits are exempt.



## Section Review

What are the rules that apply to the 85-15 policy. (Select all the answers that apply.)

- ☐ **A. Enrollments and reenrollments will be suspended for the out of compliance program effective the date that the ratio exceeded 85% of supported students.**
- ☐ **B. The number of Supported Students is added to the number of Non-supported Students for a Total Number of students. The number of Supported Students is then divided by the Total Number of students and converted into a percentage.**
- ☐ **C. You only have to count the current students and new students for this policy. The schools do not have to consider prior terms.**
- ☐ **D. Students receiving Vocational Rehabilitation and Employment (Chapter 31) or Survivors' and Dependents' Educational Assistance (Chapter 35) benefits are exempt.**



## How to Certify



# How to Certify (1 of 2)

The term "enrollment certification" refers to either the paper version of VA Form 22-1999 or the VA-ONCE version which is VA Form 22-1999-6.

Department of Veterans Affairs

Side  
A

VA ENROLLMENT CERTIFICATION

IMPORTANT: Side A is for Institutions of Higher Learning or schools offering non-degree training.

1. NAME OF STUDENT (First, Middle, Last)

2. VA FILE NO. (For chapter 35, include suffix. For Transferability cases, enter the veteran's social security number)

3. CURRENT ADDRESS OF STUDENT

4. SOCIAL SECURITY NUMBER OF STUDENT (If not entered in Item 2)

5. TYPE OF TRAINING  
☐ UNDERGRADUATE COLLEGE DEGREE  
☐ GRADUATE OR ADVANCED PROFESSIONAL  
☐ NON-COLLEGE DEGREE  
☐ FARM COOPERATIVE  
☐ HIGH SCHOOL  
☐ COOPERATIVE (Not Farm)  
☐ GUEST STUDENT (Supplemental School) (Complete Item 6C)

6A. NAME OF PROGRAM  
  
6B. IS STUDENT MATRICULATED AT YOUR FACILITY? (For I, A purposes, a student is matriculated when formally admitted as a degree seeking student)  
☐ YES ☐ NO  
6C. IS PARENT SCHOOL LETTER ON FILE?  
☐ YES ☐ NO  
7. YELLOW RIBBON RECIPIENT  
☐ YES ☐ NO

ENROLLMENT DATA

8. ENROLLMENT EFFECTIVE DATES (Month, Day, Year)		9. COURSES TAKEN			10. CLOCK HOURS PER WEEK	11. CHARGES FOR PERIODS OF INSTRUCTION		12. YELLOW RIBBON PROGRAM	13. TRAINING TIME (Graduate or Advanced Professional Program)
		TAKEN IN-RESIDENCE	TAKEN BY DISTANCE LEARNING	NON-CREDIT REMEDIAL/ DEFICIENCY/ REFRESHER					
A. BEGIN	B. END	A. HOURS	B. HOURS	C. HOURS	HOURS	A. TUITION	B. FEES	AMOUNT	

14. ADDITIONAL INFORMATION FOR HIGH SCHOOL AND FARM CO-OP COURSES

A. HIGH SCHOOLS APPROVED ON A UNIT BASIS (Enter the number of high school units for which the student is enrolled)

B. FARM CO-OP ONLY (Is student pursuing course concurrently with substantially full-time agricultural employment averaging at least 40 hours per week?)  
☐ YES ☐ NO

ADVANCE PAYMENT REQUEST - (Note: Advance payment is not accelerated payment.) (See Special Instructions.)

I REQUEST AN ADVANCE PAYMENT

15A. SIGNATURE OF STUDENT

15B. DATE SIGNED

ACCELERATED PAYMENT REQUEST  
(Note: Accelerated payment is not advance payment.) (See Special Instructions.)

I request accelerated payment. I certify that I intend to seek employment in one of the following industries: Biotechnology, Life Science Technologies, Opto-electronics, Computers and Telecommunications, Electronics, Computer-integrated Manufacturing, Material Design, Aerospace, Weapons, or Nuclear Technology.

I REQUEST AN ACCELERATED PAYMENT

16A. SIGNATURE OF STUDENT

16B. DATE SIGNED

17. REMARKS

NOTE - Complete Item 18 only if course(s) are contracted out to another school or are given at a branch location other than shown in Item 19B. Do not complete item 18 if course(s) are taken at a branch or extension of a school as defined in 38 CFR 21.4266(c).

18. NAME AND ADDRESS OF CONTRACT SCHOOL OR BRANCH LOCATION

CERTIFICATIONS - The provisions described in paragraphs (1) through (14) on the attached sheet are certified.

19A. FACILITY CODE

19B. SCHOOL NAME AND ADDRESS

19C. TELEPHONE NUMBER OF CERTIFYING OFFICIAL

19D. SIGNATURE OF CERTIFYING OFFICIAL

19E. DATE SIGNED



## How to Certify (2 of 2)

Enrollment certifications must show name of the program as it appears in Web Enabled Approval Management System (WEAMS).

This name can be identified in Public WEAMS or on VA Form 22-1998 provided by your ELR.

UNITED STATES  
DEPARTMENT OF VETERANS

Home Veteran Services Business

**WEAMS INSTITUTION SEARCH**

**Search Filters**

<b>Institution Name</b>	<input type="text"/>
<b>Program Type:</b>	<input type="text" value="Institution of Higher Le"/>
<b>Yellow Ribbon School</b>	<input type="text" value="v"/>

(Yellow Ribbon is determined per academic year that s

**Select Country:**

[VA Home](#) | [Privacy Policy](#) | [FOIA](#) | [Web Policies](#)

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## Enrollment Periods (1 of 2)

Schools not operating on a term basis are open entry/open exit.

Programs include:

- Cosmetology
- Barbering
- Auto Mechanics
- Carpentry, etc.





## Enrollment Periods (2 of 2)

Some programs have students starting and others completing in the same classroom/shop with the same instructor.

SOP may require specific grades/scores at the end of each grading period with probationary periods of one or two grading periods.





## Dates of Attendance (1 of 3)

The approved enrollment period determines the Starting and Ending Date.

### *Starting Date*

- Term – Start date identified on the school's academic calendar
- Non-term –First day the student attended class

### *Ending Date*

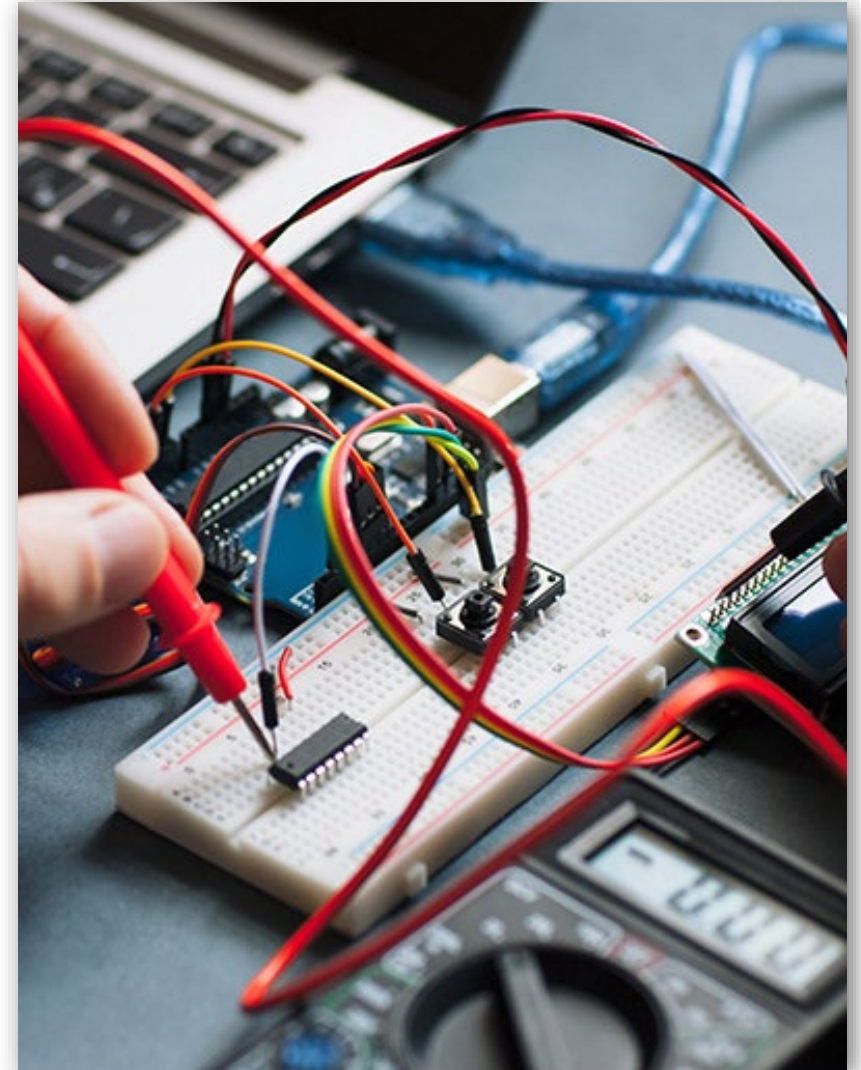
- Term – End date identified on the school's academic calendar
- Non-term –Last day the student attended class
- *For both term and non-term:*
  - If student graduate early, withdraw, or terminate enrollment, effective date is the last attendance date
  - Unsatisfactory attendance/progress terminates enrollment, effective date is the last attendance date



## Dates of Attendance (2 of 3)

Students are issued their certificate of completion once they learn all the competencies taught in the program.

VA pays to the point they earn their certificate or have sat in the classroom for the approved hours of the program – whichever comes first.





## Dates of Attendance (3 of 3)

Non-standard terms:

- Begin and end dates mirror the term dates in Academic Calendar
- Are based on the way approved by SAA





## Certifying Graduation

As of June 12, 2018, you must report graduation. This is certified in VA-ONCE as **END OF TERM OR COURSE**.





## Reporting Leave of Absence (1 of 3)

If leave of absence (LOA) requested, SCO will use an Amended Certification and provide a revised ending date if applicable.

### **Example:**

- The original certification was for January 5th to May 15<sup>th</sup>.
- Student began LOA on February 7th without a clear return date.

### **Action:**

- Amend Remarks section – LOA, 2/7 with the resume date of 5/14 (one day prior to certified period)
  - Prevents student payments during this period
  - Stops Books, Supply and MHA payments



## Reporting Leave of Absence (2 of 3)

### **Example:**

- The original certification was for the period January 5th to May 15th
- Student began LOA on February 7th without a clear return date.

### **Action:**

- Amend Remarks section – LOA, 2/7 with the resume date of 5/14 (one day prior to certified period)
  - Prevents student payments during this period
  - Stops Books, Supply and MHA payments

### **Student Returns:**

Student returned on March 5th (Amendment described in Example has been processed).

- Submit another amendment in VA-ONCE
- Remarks – LOA , 2/7 and student resumed training 3/5. Also adjust end date as needed.



## Reporting Leave of Absence (3 of 3)

### **Example:**

- The original certification was for the period January 5th to May 15th
- Student began LOA on February 7th without a clear return date.

### **Action:**

- Amend Remarks section – LOA, 2/7 with the resume date of 5/14 (one day prior to certified period)
  - Prevents student payments during this period
  - Stops Books, Supply and MHA payments

### **Student Does Not Return:**

Student doesn't return by certified end date (Amendment described in Example has been processed).

- Submit a termination in VA-ONCE
- Use correct last attendance date
  - This will result in a tuition and fee debt to the student



## Certify Tuition (1 of 3)

When you certify tuition:

- Certify the actual amount of tuition charged
- Doesn't include Title IV payments for tuition and fees (i.e. Pell Grants)
- 3<sup>rd</sup> party payments **are not** deducted from tuition certified to VA





## Certify Tuition (2 of 3)

If a student is eligible for Chapter 33 benefits and the school has a program to pay unmet charges, such payments must be deducted from the total charges certified.





## Certify Tuition (3 of 3)

Before a fee is certified, it must meet the following requirements:

- Listed in the school's catalog as a fee
- Listed on the student invoice/payment ledger as a fee
- Listed in the enrollment agreement/contract as a fee
- Not considered a pre-admission or penalty fee
- Mandatory or otherwise required of all students





## Section Review

For NCD courses, the school should show the specific approved course. If the course is not an exact match in WEAMS (VA Form 22-1998), you should still move forward.

- ☐ A. True
- ☐ B. False



## Section Review

For NCD courses, the school should show the specific approved course. If the course is not an exact match in WEAMS (VA Form 22-1998), you should still move forward.

- ☐ A. True
- ☐ **B. False**



## Section Review

Before a fee can be certified to VA, it must meet certain requirements. (Select all that apply.)

- ☐ A. Be listed in the school's approved catalog as a fee.
- ☐ B. Be listed on the student invoice/payment ledger as a fee.
- ☐ C. Be listed in the enrollment agreement/contract between the student and school as a fee.
- ☐ D. Not be considered a preadmission or penalty fee.
- ☐ E. Be mandatory or otherwise required of all similarly circumstanced students, without exception.



## Section Review

Before a fee can be certified to VA, it must meet certain requirements. (Select all that apply.)

- ☐ A. Be listed in the school's approved catalog as a fee.
- ☐ B. Be listed on the student invoice/payment ledger as a fee.
- ☐ C. Be listed in the enrollment agreement/contract between the student and school as a fee.
- ☐ D. Not be considered a preadmission or penalty fee.
- ☐ E. Be mandatory or otherwise required of all similarly circumstanced students, without exception.



## Compliance Surveys



# Compliance Survey



The two main purposes of surveys are to:

- Ensure that VA are based on correct enrollment information
- Assist school and training officials to understand the requirements of the law to prevent violations



# The Buckley Amendment



Family Educational Rights and Privacy Act (FERPA), also known as The Buckley Amendment:

- Requires institutions receiving Federal funds to obtain the student's consent to release records.
  - Financial aid is exempt.
- Allows access to records of VA and non-VA students without the written consent



## What is Reviewed During a Compliance Survey (1 of 4)



The following checks are made during a Compliance Survey:

- The correct amount of tuition and fees was certified for reimbursement
- The correct begin and end term dates were used
- The credits and clock hours were certified correctly
- Prior credit was reviewed for and applied, when applicable



## What is Reviewed During a Compliance Survey (2 of 4)



The following checks are made during a Compliance Survey:

- Amendments, adjustments, and terminations were reported promptly and correctly
- The school enforced all established standards of progress
- Refunds are promptly and correctly made
- The facility is correctly utilizing Reporting Fees
- The facility's advertising is not erroneous or deceptive



## What is Reviewed During a Compliance Survey (3 of 4)



The following checks are made during a Compliance Survey:

- The facility is not providing incentives recruiters based on enrollments from GI Bill students
- The facility is in compliance with the 85-15 Rule
- The facility is following its approval criteria



## What is Reviewed During a Compliance Survey (4 of 4)



The following checks are made during a Compliance Survey:

- The SCO is also a GI Bill beneficiary
- All SCOs are approved and their information is up-to-date
- Work-Study students are properly utilized and their hours reported



## Compliance Survey Best Practices (1 of 2)

A close-up photograph of a hand using a pen to fill out a survey form. The form has four columns labeled "Excellent", "Good", "Fair", and "Poor". Each column contains a series of checkboxes. The "Good" column has three checkboxes marked with blue checkmarks. The "Fair" column has one checkbox marked with a blue checkmark. The "Poor" column has one checkbox marked with a blue checkmark. The "Excellent" column has no checkboxes marked. The text "With the following items?" is visible above the columns.

Follow this list of Best Practices:

1. Documents should be clearly labeled and arranged in files according to the VA beneficiary to be reviewed
2. The SCO should be available throughout the survey
3. Prior to survey, the SCO should provide detailed map, via email, about how to get to their office and any school specific procedures



## Compliance Survey Best Practices (2 of 2)

A close-up photograph of a hand using a pen to fill out a compliance survey form. The form has four columns labeled "Excellent", "Good", "Fair", and "Poor". Each column contains a series of checkboxes. The "Good" column has three checkboxes marked with blue checkmarks. The "Fair" column has one checkbox marked with a blue checkmark. The "Poor" column has one checkbox marked with a blue checkmark. The "Excellent" column has no checkboxes marked. The text "With the following items?" is visible above the columns.

Follow this list of Best Practices:

4. SCO's should ensure all documentation requested are made available
5. Documents if possible, should not be stapled
6. The SCO should have a legend for all codes and grades
7. If in electronic format, the reviewer should be provided a workstation with dual monitors



## Section Review

During a Compliance Survey visit, the following documents will be reviewed:

- ☐ A. Timecards/Payroll Records/Time & Leave Records
- ☐ B. Training Progress Records
- ☐ C. Proof of related instruction, if applicable
- ☐ D. All of the above



## Section Review

During a Compliance Survey visit, the following documents will be reviewed:

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- ☐ **D. All of the above**



You should be able to:

- Describe the methods for measuring courses at an NCD facility
- Identify policies that must be followed for certifying benefits at an NCD facility
- Describe the Certification Processes for VA Education Benefits
- Identify the documentation needed for Compliance Surveys



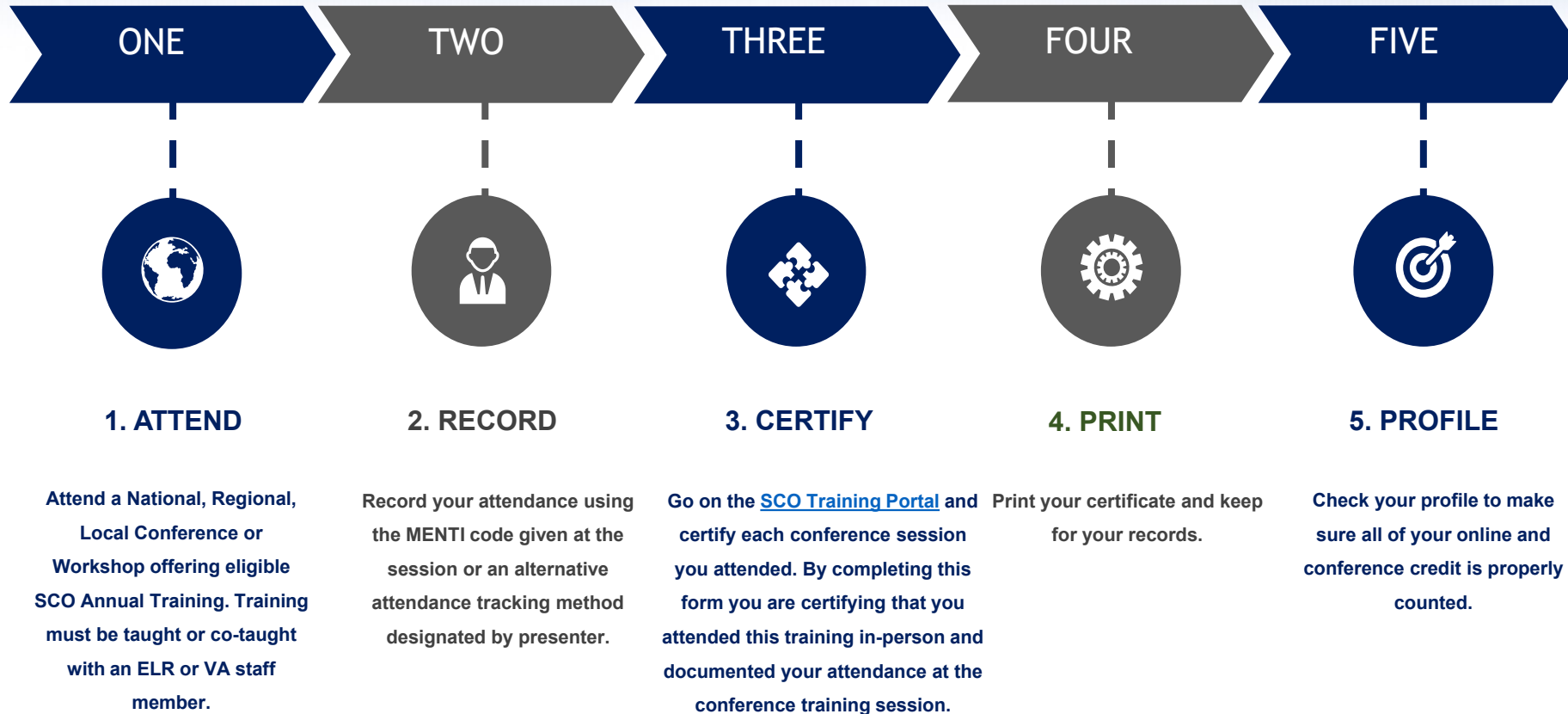


## Q & A





# CONFERENCE/VIRTUAL TRAINING CREDIT PROCESS





# FY'21 SCO Annual Training Requirements

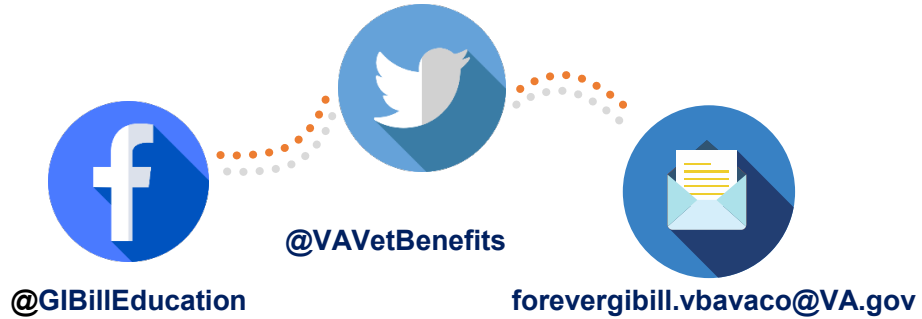
Here are important training dates for School Certifying Officials (SCOs).



**Please remember, if you don't complete your annual training requirements, VA has the authority to remove your access from VA-ONCE and the SAA has the authority to disapprove your school's programs.**



# SCO Training Resources



## School Resource Page

<https://www.va.gov/school-administrators/>



## SCO Training

[https://www.benefits.va.gov/gibill/resources/education\\_resources/school\\_certifying\\_officials/online\\_sco\\_training.asp](https://www.benefits.va.gov/gibill/resources/education_resources/school_certifying_officials/online_sco_training.asp)



## FAQs

<https://gibill.custhelp.va.gov/app/answers/list/session/L3RpbWUvMTU3MTIxOTM4MS9zaWQvcWxoS0Vzcm8=>



## School Certifying Official's Handbook

[https://www.benefits.va.gov/GIBill/docs/job\\_aids/SCO\\_Handbook.pdf](https://www.benefits.va.gov/GIBill/docs/job_aids/SCO_Handbook.pdf)





**Thank you for your time today!**