

Education Service

School Certifying Official Webinar | June 28, 2013

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U.S. Department
of Veterans Affairs

Agenda

- Today we will give you an update on Education Service
 - Program successes
 - The Long Term Solution
 - Executive Order 13607
 - PL 112-249
- We will then answer questions you submitted prior to this webinar.
 - You may submit questions during this webinar
 - Questions received during the webinar will be answered at a later date

Housekeeping

- Participants may submit questions and feedback during the webinar. We want this to be beneficial for you.
- Answers to questions will be provided when a copy of the webinar is uploaded to www.gibill.va.gov.
- To find the webinars on the website visit www.gibill.va.gov > click on “School Resources” > then select “Education Benefit Presentations” from the Certification and Training box.
- For any **specific** or **situational** questions you may have, please be sure to contact your ELR or call the SCO Hotline .



On behalf of the Under Secretary for Benefits Ms. Allison Hickey, the Deputy Under Secretary for the Office of Economic Opportunity Mr. Curtis Coy, I welcome you to our continuing series of webinars.

We are here to discuss ways in which we can both serve Veteran students better and make the job easier for everyone.



Program Success

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*SUBMIT YOUR QUESTIONS AND FEEDBACK TO THE
MODERATORS*

FY 11 – FY 12 Trainees/Dollars Paid

Benefit	Education Program	FY 11 Trainees / Dollars Paid	FY 12 Trainees / Dollars Paid
Chapter 30	Montgomery GI Bill (MGIB)-AD	185,220 / \$1.4B	118,549 / \$932M
Chapter 32	Veterans Educational Assistance Program (VEAP)	112 / \$1.3M	76 / \$682K
*Chapter 33	Post-9/11 GI Bill	555,329 / \$7.7B	646,302 / \$8.5B
Chapter 35	Survivors' and Dependents' Educational Assistance Program (DEA)	90,657 / \$463M	87,707 / \$455M
Chapter 1606	Montgomery GI Bill Selected Reserve (MGIB-SR)	65,216 / \$201M	60,393 / \$157M
Chapter 1607	Reserve Educational Assistance Program (REAP)	27,302 / \$95M	19,774 / \$77M
	Veterans Retraining Assistance Program (VRAP)	N/A	12,251 / \$6.1M
Total		923,836 / \$9.8B	945,052 / \$10.1B

***VA has issued \$29.8 billion in Post-9/11 GI Bill benefit payments to 985,000 individuals since program inception (August 2009).**

Long Term Solution (LTS) - Major Releases



Long Term Solution (LTS) Automation

•LTS Off-Ramps

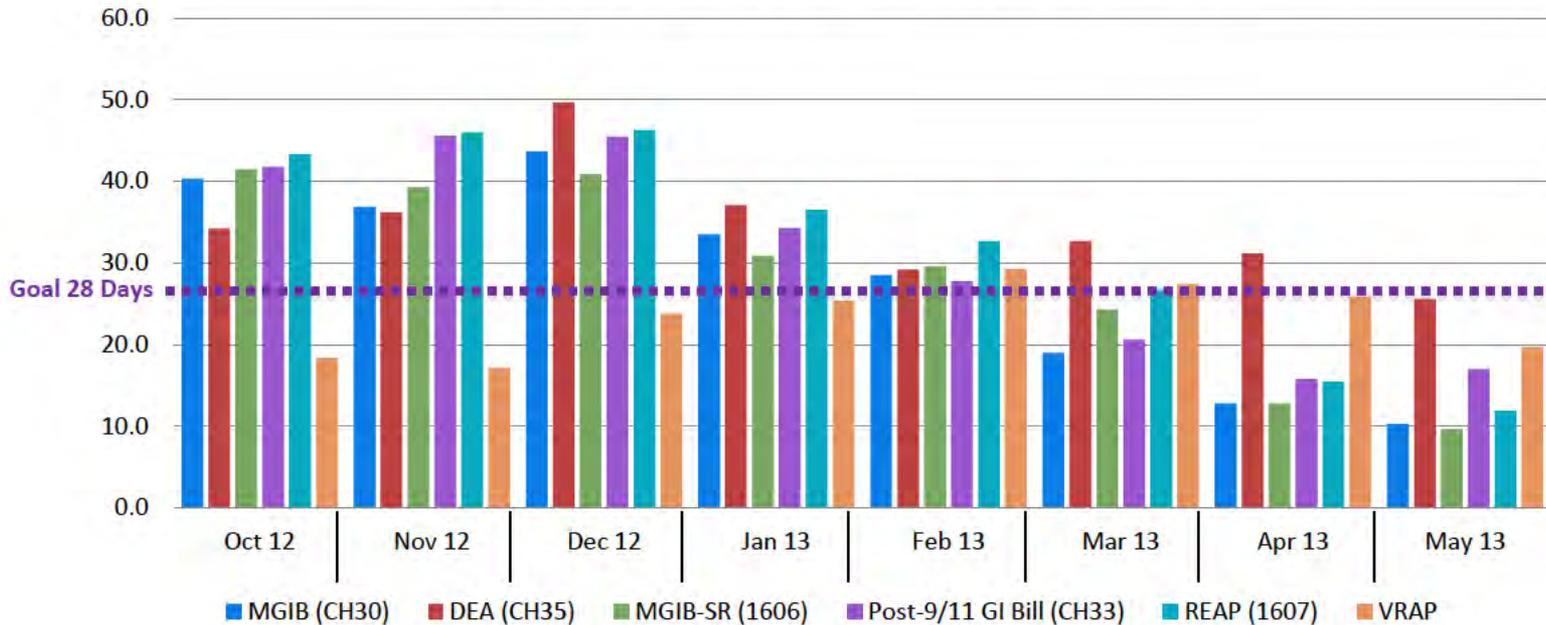
- Business rules designed to ensure accurate payments to veterans
- VA continues to work to reduce the claims off ramped
 - Announcements posted on the GI Bill website and sent to CELOs and SAAs about claims automation and off ramps due to non-standard remarks
 - Information about non-standard remarks added to VA-ONCE Quick Reference User Guide and revised SCO Handbook
- Two major reasons for off-ramped claims are:
 - Unnecessary school comments submitted through VAONCE:
 - We are continuing to train schools to eliminate unnecessary comments
 - LTS enhancements in Release 6.1 helped reduce this off-ramp by simplifying both automated and manual claims processing.
 - Change of Address by School:
 - We are planning future rule changes to minimize unnecessary off-ramp for this reason

Request to SCOs...Use the remarks section only when absolutely necessary.

Long Term Solution (LTS) Transition / Way Ahead

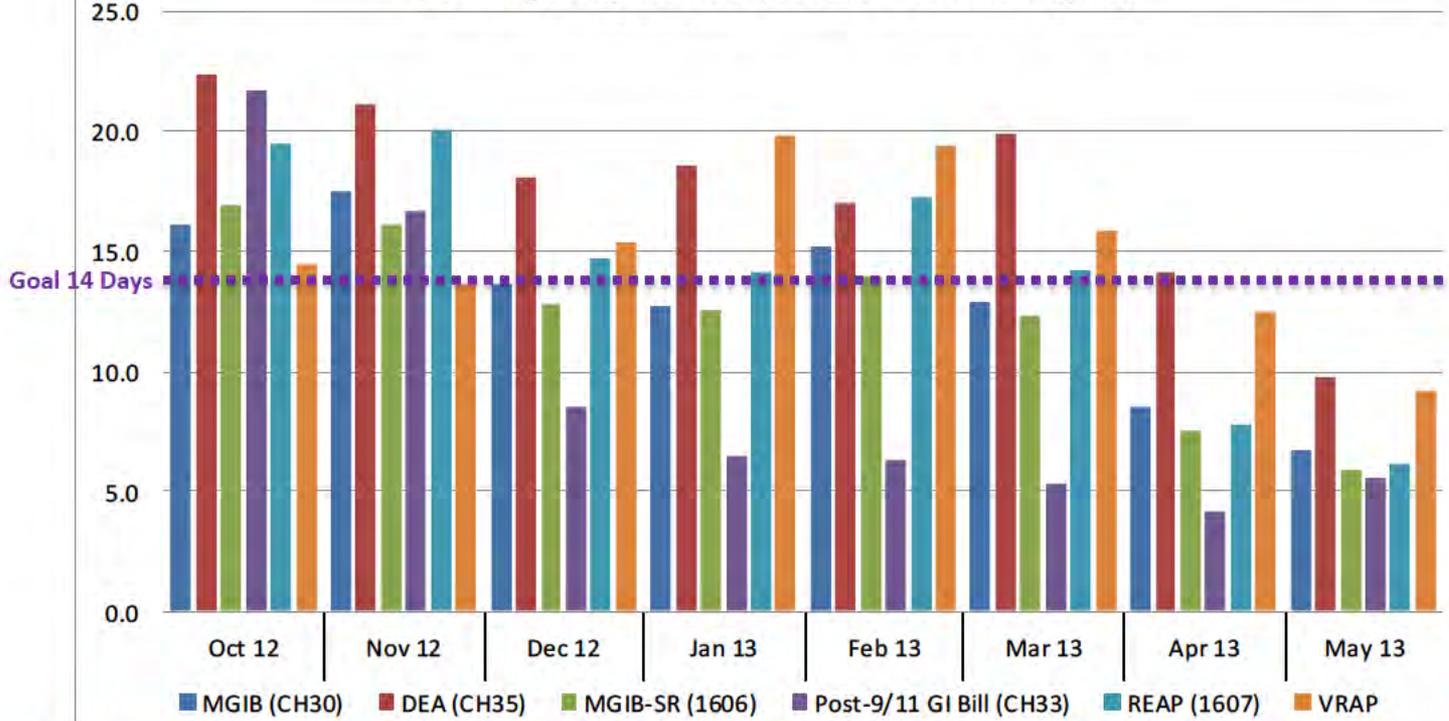
- **LTS Transition:** From Development to Sustainment Phase
 - LTS entered into the maintenance phase on March 31, 2013
 - Limited development
 - Eleven work-streams transitioned from development contractor to VA
- **Upcoming LTS efforts:**
 - BAH Adjustments (effective August 1, 2013)
 - Release 6.3 (July/August 2013)
- **LTS Way Ahead**
 - Limited development of LTS in a sustainment phase
 - Deferred functionality still required
 - Certificate of Eligibility and End-to-End Automation
 - Future Automation of Supplemental Claims
 - Electronic Letters via eBenefits
 - Centralized Printing
 - Business Analytics
 - Chapter 33 benefit access for SCOs

Education Original Claims Processing Timeliness (Average Days to Complete – All Benefit Types)



Original Claims	Oct 12	Nov 12	Dec 12	Jan 13	Feb 13	Mar 13	Apr 13	May 13
MGIB (CH30)	40.3	36.9	43.7	33.5	28.5	19.0	12.8	10.3
DEA (CH35)	34.2	36.2	49.7	37.1	29.2	32.7	31.2	25.6
MGIB-SR (1606)	41.5	39.3	40.9	30.9	29.6	24.3	12.8	9.7
Post-9/11 GI Bill (CH33)	41.8	45.6	45.5	34.3	27.8	20.6	15.8	17.0
REAP (1607)	43.3	46.0	46.3	36.5	32.7	26.7	15.5	11.9
VRAP	18.4	17.2	23.8	25.4	29.3	27.4	25.9	19.7
Average All Programs	35.9	39.0	41.9	32.8	28.4	22.5	18.2	17.0

Education Supplemental Claims Processing Timeliness (Average Days to Complete -All Benefit Types)



Supplemental Claims	Oct 12	Nov 12	Dec 12	Jan 13	Feb 13	Mar 13	Apr 13	May 13
MGIB (CH30)	16.1	17.5	13.6	12.7	15.2	12.9	8.5	6.7
DEA (CH35)	22.4	21.1	18.1	18.6	17.0	19.9	14.1	9.8
MGIB-SR (1606)	16.9	16.1	12.8	12.6	14.0	12.3	7.5	5.9
Post-9/11 GI Bill (CH33)	21.7	16.7	8.5	6.5	6.3	5.3	4.2	5.6
REAP (1607)	19.5	20.1	14.7	14.1	17.3	14.2	7.8	6.1
VRAP	14.5	13.6	15.4	19.8	19.4	15.9	12.5	9.2
Average All Programs	20.8	17.0	9.9	8.5	8.8	7.9	5.7	6

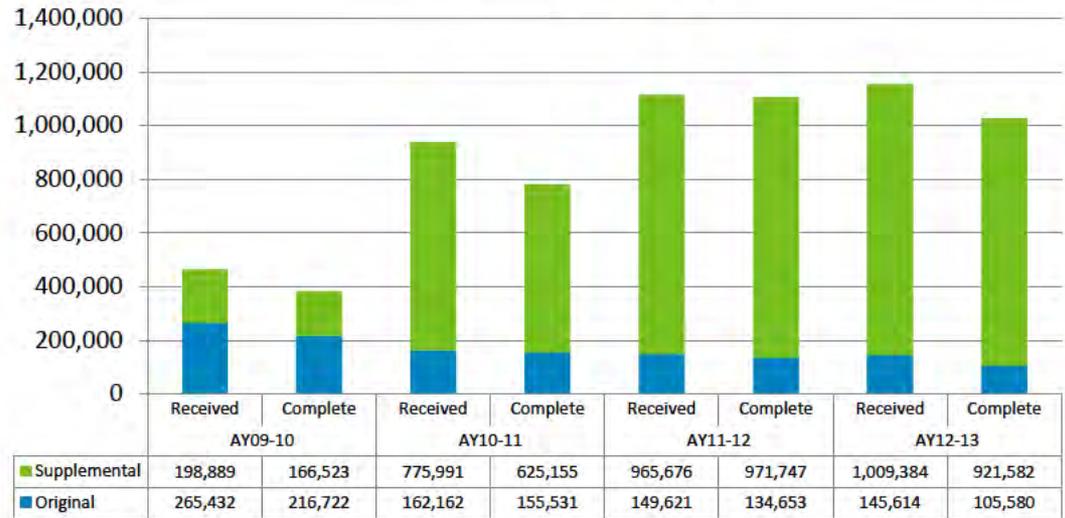
Chapter 33 Production Comparison

LTS Production Gains

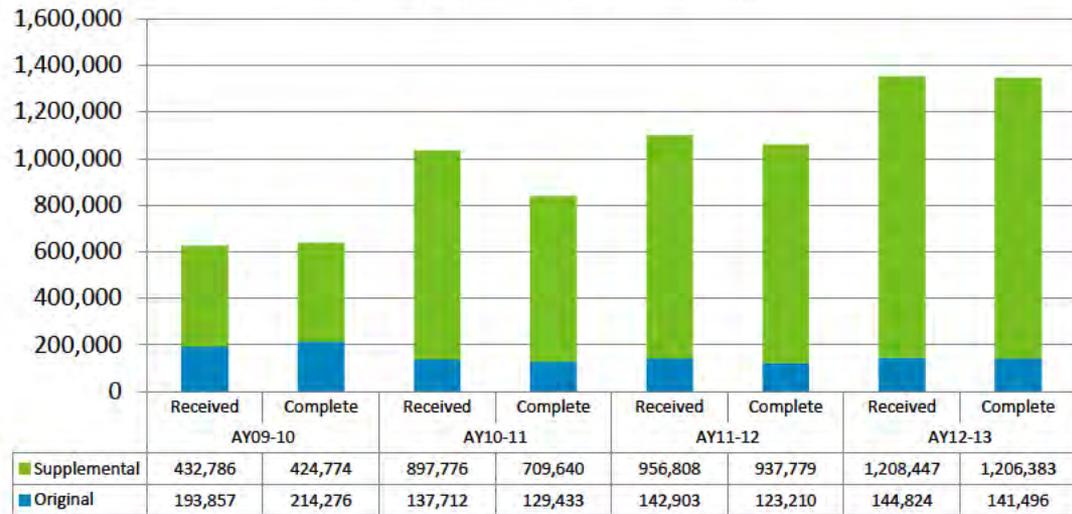
Time Period	Ave per month Completed	% Change*
Pre-LTS (May 09 – Feb 10)	79,434	N/A
LTS- Pre End-to-End (Mar 10 – Sep 12)	184,234	132%
LTS Post End-to-End (Oct 12 – Apr 13)	274,280	49%

*Percent Change from previous production era

Fall Semester (Aug-Dec)



Spring Semester (Jan-May)



Increasing Demand – Increasing Production

EO 13607: Principles of Excellence

- Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans, Spouses, and Other Family Members.
 - Provide information about the financial cost and quality of educational institutions;
 - Prevent abuse and deceptive recruiting practices; and
 - Ensure that educational institutions provide high-quality academic and student support.
- Recently Completed Activity
 - February
 - ED released College Scorecard
 - VA Complaint System of Record Notice (SORN) submitted to Federal Register for public comment
 - March
 - Yellow Ribbon Program open season (March 15 – May 15) includes option to enroll in Principles of Excellence
 - Incorporated College Navigator into GI Bill website
 - VA Complaint System of Record Notice (SORN) approved
 - April
 - Targeted outreach to US News & World Report top schools to encourage participation
 - Targeted outreach to top veteran educational institutions to encourage participation
 - CFPB updated “Paying for College” website to include GI Bill calculator to aid in determining total cost for college
 - May
 - 3572 educational institutions (6,220 campuses) committed to comply with the POE as of May 10, 2013
 - POE Centralized Complaint System Intake Questionnaire completed public comment period and submitted to OMB

Principles of Excellence – Centralized Complaint System

- VA and DoD will create a complaint system for students to register complaints that can be tracked and responded to
 - Interim Approach – Leverage existing capabilities (i.e. GI Bill website webform, Education Service National Call Center, etc.) to receive complaints from students.
 - Upon completion and approval from OMB VA can begin accepting complaints
 - Plan to begin accepting complaints Summer 2013
 - Long Term Approach – Further automate the processing of complaints, provide a feedback loop by which VA will monitor complaints with schools and make complaints public.
 - Coordinating to leverage DoD Complaint System for VA
 - Agencies are developing uniform procedures for receiving, processing, and sharing complaint information
 - Complaints will be forwarded to and will reside in Federal Trade Commission's Consumer Sentinel database
 - Database will be accessible to review external complaints, run reports, and identify trends that potentially warrant criminal or civil investigation

Principles of Excellence – Student Veteran Outcome Measures

- VA, DoD, and ED will develop Student Veteran outcome measures
 - Purpose of Outcome Measures:
 - To ascertain success among veterans in utilizing the GI Bill program.
 - To identify what the Veterans/Servicemembers need to know when choosing a school.
 - To identify what the Federal government should know to ensure an education program is appropriate.
 - Agencies developed proposed list of measures comparable for Veteran and military educational programs as closely as possible with ED's outcome measures
 - Proposed Outcome Measures:
 - **During School** – Retention %, Persistence %, Transfer Rate for Community Colleges and Courses Completed/Credit Earned
 - **Completion of School** - Graduation % , Degrees/Conferred, and Federal Student loan debt load
 - **Post Graduation** - Salary, Employment in field of study %, Unemployment %, and Repayment % (or CDR)
 - The proposed list has been vetted with VSOs and higher education associations
 - Agencies are collaborating to define measures and cohort requirements and begin data collection targeted for Aug 2013

Principles of Excellence – Risk Based Program Reviews

- VA will establish procedures for Risk-Based Program Reviews of institutions to ensure compliance with the Principles
 - Established a Risk-Based Review sub-working group in April to:
 - Update compliance survey procedures to incorporate Principles of Excellence
 - Develop procedures to conduct Risk Based Program Reviews
 - Developed risk matrix for red flags with triggers and examples that may generate a risk based review
 - Coordinating with DoJ to conduct Fraud Awareness Curriculum for Complaint Case Managers, ELRs/ECSSs, and SAAs
 - To be conducted in conjunction with launch of PoE Complaint System
 - Developed work flow for complaint handling and risk based review processing.

Principles of Excellence – Comparison Tool

- VA will provide prospective military and veteran students, prior to using their benefits, streamlined tools to compare educational institutions using key measures of affordability and value
 - Interim Approach:
 - Link on eBenefits to College Navigator
 - College Navigator embedded into GI Bill Website
 - Current Status
 - Project initiation/business requirements for the Comparison Tool/Benefits Estimator were submitted in March 2013
 - Initial tool to include: graduation rate, retention rate, loan default rate, avg student loan debt, veteran population, Yellow Ribbon Program, POE participation, cost indicators – tuition/fees
 - Projected initial comparison tool targeted for August 2013
 - Long Term Approach
 - Enhanced comparison tool to include veteran student outcome measures, other veteran specific information, and feedback from requirements in PL 112-249

PL 112-249, Improving Transparency of Education Opportunities for Veterans Act of 2012

- Comprehensive policy on providing education information to Veterans
 - Effective and efficient methods to inform individuals of their education and vocational counseling.
 - Centralized tracking and publishing of feedback from students and State Approving Agencies.
 - Web-based tool to compare programs and estimate GI Bill benefits.
 - Transition Assistance Program information accessible for future students and schools.
 - Not approve programs and/or schools that use enrollment incentives.
- Requirements
 - Develop regulations, procedures, and policies necessary to execute the law
 - Conduct two market surveys for online tools to do the following
 - Assess whether an individual is academically ready to engage in postsecondary education and training
 - Provide a list of providers of postsecondary education and training based on selected criteria
 - Submit 90-Day Report to Congress by April 10, 2013
- Implementation
 - Established Integrated Project Teams to implement PL 112-249
 - Created an integrated schedule for project management
 - Integrated deliverables from EO 13607 and PL 112-249 to capitalize on EO work completed

PL 112-249, Improving Transparency of Education Opportunities for Veterans Act of 2012 (cont.)

- Delivered 90-day report to Congress April 10, 2013
 - Provided summary of new policies and plan for implementing programs
 - Available at gibill.va.gov/documents/Report_to_Congress.pdf or gibill.va.gov > scroll down to Announcement feed
- Conducted market surveys for online tools to:
 - Assess whether an individual is academically ready to engage in postsecondary education and training or would need remedial preparation before beginning.
 - Based on the market survey results, CareerScope® was identified as the likely preferred commercially available off-the-shelf online tool.
 - Will offer pilot program of self-administered assessments on gibill.va.gov starting late summer 2013
 - Provide a list of providers of postsecondary education and training based on selected criteria.
 - The recommended interim solution for the Comparison Tool includes working with ED to create a Benefit Estimator tool with College Navigator hosted on gibill.va.gov and eBenefits.va.gov
 - The long-term approach for the Comparison Tool with additional enhancements targeted for April 2014

PL 112-249, Improving Transparency of Education Opportunities for Veterans Act of 2012 (cont.)

- Conducting national campaign to promote Chapter 36 Vocational Counseling for Veterans through the Vocational Rehabilitation and Employment program
 - VBA is promoting vocational counseling through the VetSuccess on Campus Programs at 35+ schools
 - A letter is sent to all Veterans on academic probation informing about counseling through CH36
 - VBA is developing a larger outreach strategy to include all schools approved for CH33
- Providing assistance to School Certifying Officials for certifications and reporting
 - Training conferences
 - Comprehensive SCO Handbook
 - Education Service Webinars
 - Online resources – <http://www.gibill.va.gov/school-certifying-officials/>
- Facilitating information sharing between State Approving Agencies and accrediting agencies on program approval and evaluations of schools
 - VBA is working with the State Approving Agencies and the Department of Education to draft coordination procedures with accrediting agencies
- Developing policy on prohibition of certain uses of inducements by educational institutions (commissions, bonuses, or incentive pay for securing enrollments, financial aid, etc)

Breaking News - Compliance Progress

Education Compliance Surveys

- In partnership with SAAs, VA ensures schools and training establishments are in compliance with all applicable provisions of the laws administered by VA
- In FY12 VA and SAAs completed over 4,700 compliance reviews of schools, an increase of more than 147% over FY11 (1,900)

Compliance Survey Redesign Working Group (CSRWG) Established Sep 2012

- Examine all aspects of the Compliance Survey process in order to make mutually agreed upon modifications which ultimately provide improved delivery of educational benefits to Veterans
- Made up of VBA and National Association of State Approving Agencies (NASAA) leadership and representatives

Accomplishments

- Reduced number of compliance visits per SAA staff member to 20
 - SAAs may conduct supervisory technical visits
 - FY 13 Compliance Guidance reduced number of files to be reviewed
 - Began pilot of “Referral Process” streamlining correction of survey discrepancies
 - Implemented “Best Practices” student worksheet developed by an SAA
 - Results: compliance survey time reduced by approximately 40%

Compliance Streamlining = More time for approvals, training, supervisory visits, outreach

Breaking News – USB Summer Enrollment Letter

- The Under Secretary for Benefits, Allison Hickey, issued a letter outlining ways educational institutions can assist with timely VA education payments
 - Ensure School Certifying Officials (SCOs) submit enrollment certifications to VA as quickly as possible, preferably before the start of the school term
 - Encourage Veterans to routinely interface with the SCO on campus. The SCO is the key connection point between the school and Veterans who are utilizing their benefits
 - Help Veterans understand housing allowance is paid in arrears (by law) and is apportioned by the period of time the school is operational for the month
 - Ensure SCOs stay connected with VA for program updates and to address questions or problems
 - Provide Veterans awaiting GI Bill payments with information on available financial assistance

Breaking News – Employee Transition

- VBA is transitioning 100 Employees from Education Claims Processing to Disability Claims Processing
 - The Department of Veterans Affairs (VA) is transitioning 100 education employees from the Atlanta Regional Processing Office (RPO) to work disability compensation claims.
 - VBA is able to transition the employees due to the successful implementation of automated processing for supplemental Post 9/11 GI Bill education claims.
 - The 100 employees will begin working disability claims in September 2013.
 - Includes jurisdictional change for FL and SC to Muskogee
 - VBA expects minimal impact to education claims processing timeliness



Questions & Answers

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Questions

1) Q: How can a school dispute a debt?

A: Schools must contact DMC to dispute a debt. The best way to submit a dispute is to email DMC at dmcedu.vbaspl@va.gov. Schools may also call DMC's toll free number and speak to a customer service representative or mail a written dispute to DMC. DMC's contact information can be found at: <http://www.va.gov/debtman/>.

DMC will automatically suspend collection of a school debt if a dispute is received prior to referral to TOP. The school will be notified of VA's decision regarding the dispute, and DMC will continue the collection action if appropriate.

2) Q: How does Treasury Offset Program (TOP) work for school debts?

A: Once debts are referred to TOP, VA is no longer collecting the debt and control of the collection is managed by the Department of Treasury. The TOP process will capture funds payable to the school issued by other government entities. When an offset occurs Treasury will also assess a \$17.00 administrative fee. Once funds are captured, they are forwarded to VA's Debt Management Center (DMC) who is responsible for applying the funds to the school debt. Additional information on TOP, and contact information, can be found at the following website <http://fms.treas.gov/debt/top.html>

NOTE: The process of referring a debt to TOP takes at least 120 days. During this timeframe the school will receive one letter from the RPO of jurisdiction and three letters from DMC.

Questions (cont.)

3) Q: I am having issues with the TOP program. We had funds withheld from our university in error on the VA's part. The debts were actually paid but the monies were still withheld. The monies have since been sent back to our university but no one can tell us what fund it needs to be applied to now. I have contacted Treasury, Debt Management, and VA and I keep getting passed around in a circle. Please help me!!

A: If you want to find out the specific payment from which the offset was deducted, contact the Treasury Offset Program Call Center using the contact information at <http://fms.treas.gov/debt/top.html>.

We strongly suggested that schools wait until they receive the first notification of indebtedness and then return the funds directly to DMC. By doing so, mishaps like this will be avoided.

4) Q: When will VA update the award letter for Post 9/11 recipients in regards to the Tuition and Fees portion, the award letter still has tuition and fees separated, so it appears that the school does not report any charged fees.

A: This update will be made to the award letter subject to available funding and development needs of the Long Term Solution claims processing system.

5) Q: Why is VA sending out COEs for VRAP students that show Universities, 4-year schools, as eligible for VRAP?

A: A four year school that primarily confers associate degrees qualifies for VRAP. No one should be issued CoEs for programs offered at schools that offer primarily four year degrees i.e. University of Fairbanks, AL.

Questions (cont.)

6) Q: What is actually considered a program? Is there a number of credit hours or classes to be taken to justify being a program?

A: A “Program of Education” is defined by the SCO handbook as “A combination of subjects, unit courses, or training activities pursued at a school or training establishment which is generally accepted as necessary to meet requirements for a predetermined educational, professional, or vocational objective (that is, diploma, degree, certificate, occupation). An “approved program” is a course of study or program of training that the appropriate State Approving Agency has determined meets the legal requirements for payment of VA educational assistance benefits to Veterans and other eligible persons”.

7) Q: When will SCO’s have view access to eBenefits? If not anytime soon, can we at least have eligibility/award visible in VA ONCE for all benefits?

A: There is no plan for giving schools access to eBenefits at this time. Unfortunately we would have to create a new system to give schools limited access, and that would require major funding, and VA currently has other priorities to use any available funds.

8) Q: Can the SCO’s get access to the students Certificate of Eligibility and if the student is near the end of using all of their benefits, can the schools be notified?

A: Unfortunately the privacy act prevents us from sending the Certificate of Eligibility to anyone other than the Veteran. We are looking at the requirements to make the necessary changes to VA-ONCE to provide that information, however funding is always a concern.

Questions (cont.)

9) Q: When will VA put in writing that the reporting fee is “required” instead of “highly recommend” that these funds be utilized for the SCO to participate in state, regional and national trainings/conferences? With the Annual Reporting Fees, does it have to go into a specific account? What do SCO’s need to use to show how the money is being spent?

A: The law states: “Any reporting fee paid an educational institution or joint apprenticeship training committee after the date of the enactment of the Post-9/11 Veterans Educational Assistance Improvements Act of 2011 shall be utilized by such institution or committee solely for the making of certifications required under this chapter or chapter 31, 34, or 35 of this title or for otherwise supporting programs for veterans.”

We don’t want to arbitrarily limit schools to a specific list of things toward which the funds can be used. However, the items on the list of “highly recommended” uses are in line with the law. If you are unsure whether some other use of the reporting fees is permissible, contact your ELR.

Questions (cont.)

10) Q: Once a student reaches the maximum allowed per year and the student has a debt with the VA, the tuition and fees are applied to the debt and if any funds are left are sent to the student. Why is the student debt not taken out of their BAH? Why is the school being penalized?

A: We don't pay T&F benefits to the student; we restore benefits and apply them toward a student T&F debt. This occurs when:

1. We have paid the maximum amount to the school for the academic year, and
2. The student makes an adjustment leading to a student debt, and
3. The student then enrolls (or increases enrollment) during the same academic year leading to a restoration of benefits.

Since we have already paid the annual maximum amount of tuition and fees to the school, we cannot pay any more because of a student debt; that would be illegal. Consequently, any award amounts generated a later enrollment (or increase in enrollment) for the same academic year are applied toward the previously established student debt.

11) Q: For scheduled breaks, it would be nice if there was a field where we just enter the total number of days for the term the student will be on break. This would save the time of placing a comment and would allow for auto processing instead of manual for the certs.

A: For standard terms breaks do not need to be reported. For non-standard terms, breaks of 7 consecutive calendar days or less do not need to be reported to the VA. For example, a veteran can have three breaks of 6 days during a term and it need not be reported. However, in a non-standard term all breaks longer than 7 consecutive must be reported in the remarks section because they must be taken into consideration when we compute the training time. A School Standard Remark can be created for this situation. At this point, we do not have the ability to automate a field with only the break days, but it is being considered as a future enhancement.

Questions (cont.)

12) Q: Why are Licensing fees and books and required drug test/physical exams not covered under Chap. 33? Without a License we cannot count them as graduated. Physical Exams and drug screens are also required under the Federal Register.

A: The exam is required for the occupation, but not for admission to the school. We can only pay for charges required to pursue the program of education. These costs seem to be associated to be required to participate in a certain occupation.

13) Q: Payments are extremely slow, what can we do (or not do) that would help facilitate quicker payment?

A: We are currently averaging 13 days for original claims and 5 days for supplemental claims, with nearly 50% of our Ch33 claims being processed entirely by machine. The best way to speed up your claims processing time is to submit all enrollment certifications via VONAPP and refrain from using any comments unless absolutely necessary.

14) Q: The inability to amend or make corrections in VAONCE is frustrating and inefficient.

A: To make a correction to a term in VA-ONCE, you can select the "Amend" option. This allows you to correct the begin date, end date, add an advance pay request, or change the tuition and fees. To change the hours, you should select the "Adjust" and change the hours as appropriate.

Questions (cont.)

15) Q: Communication is non-existent between the VA and the SCO. An online chat or help request would be fabulous, to do things like track a payment.

A: If you are having problems contacting us for specific questions you should either use the SCO hotline or send us an online inquiry with the words “School Certifying Official” in the title (this will route the inquiry to a priority queue). You can also contact your ELR and have them update your status in Right Now Web to a school official; this gives you other capabilities i.e. seeing all incidents created by multiple SCOs at larger schools, easier tracking of incidents, etc.

If you are asking about online live chat, that is something we are looking into, we have the capability; it is just a logistical issue.

16) Q: How do I report grades for Chapter 33 benefits?

A: Grades need not be reported unless they are non-punitive or incomplete grades, for how to do this see page 46 of the SCO handbook. For academic probation reporting requirement, see page 76 of the SCO handbook.

17) Q: Our institution would be interested in other schools best practices with returning funds for students who unofficially withdraw from the college –as well as reporting poor academic progress for students receiving VA Educational Benefits.

A: [The National Association of Veterans Program Administrators \(NAVPA\)](#) and [the Western Association of Veterans Education Specialists \(WAVES\)](#) come to mind as great resources, there are also several regional and state information resources available. Contact your ELR or see the “[Conferences & Events](#)” page for more information.

Questions (cont.)

18) Q: We are a private school, not for profit and for the veterans using Post 911 at our school, the SCO must keep track of all the payments from the VA for the entire year even if the student transferred from another school so that we can know what amount to bill the VA for the yellow ribbon portion. This is very time consuming and difficult to track all of our veteran students. If a student transfers from another school at any time during the year, they must tell us how much the VA paid to the other school so we can calculate the correct yellow ribbon, however if the student withdrew from another school the amount would be incorrect. Is there any way to make this process easier?

A: Amount paid towards academic year cap in VA-ONCE. There are plans to add that data element and we'd like to provide but it's dependent on additional funding for further IT development.