General

1. Tuition and fees of $1,000.00 paid, then amended to $600.00. Shouldn't the debt be placed on the student as it was after an adjustment was reported?

If the adjustment is to tuition and fees with no change in hours or term length, then it is a school debt. Please refer to "Chapter 33 Fiscal Issues" in the School Certifying Official (SCO) Handbook.

2. Do they touch more on dual certifications in the handbook?

Additional information is provided in the SCO handbook under "Chapter 33 Enrollment Certifications".

3. VA audit- how to prepare and requirements.

The SCO Handbook covers Compliance Surveys- what is reviewed and common issues. For further explanation or clarity, please contact your ELR.

4. What's the CAP for 2018-2019?

The payment rates for the 2018 Academic Year (August 1, 2018- July 31, 2019) can be found at https://www.benefits.va.gov/GIBILL/resources/benefits_resources/rate_tables.asp

5. What about using Student Clearing House?

Student Clearing House is a 3rd party vendor and we (VBA Education Service) would have to enter into a contract with Student Clearing House in order to utilize their services. VBA Education Service has worked with Student Clearing House in the past and we are currently exploring future options with vendors.

6. Can you explain the point behind having to submit the original T/F amount if a change has taken place in enrollment, given student debt is based on a school's overpayment?

The VA has different payment rules which may allow us to pay for days/hrs./credits based on a student's original enrollment. As such, the VA requires the original tuition/fees and credit hours prior to a reduction.

7. Could you differentiate "never attended" vs. abandoned?

For 75B (school) debts "Never attended" refers to non-attendance. Abandoned implies once having attended. If the student withdraws on or before the first day of the term, then it's considered non-attendance and a 75B debt would be created.

8. Is the standard MAH for online classes $840.50?

The distance-only monthly housing allowance for eligible individuals training at full-time is $825.00 for 2018-2019 academic year. Click: Rate Tables
9. Has the VA made a decision on ACICS institutions eligibility past June 11th? with the new decisions are we able to continue certifying students?

Based on March 23, 2018, Memorandum Opinion, all ACICS activity should resume as if the Department of Education revocation never occurred. However, if your program is no longer accredited by ACICS and has not obtained accreditation from another accrediting agency recognized by the Secretary of Education, you cannot certify.

www.ed.gov/acics
List of Nationally Recognized Accrediting Agencies

10. Currently to submit for class/program approval through a state approving agency the VA policy requires the physical submission (or CD copy) of two academic catalogs (38 CFR 21.4252). Currently, many schools now use an electronic academic catalog available through the institution’s website and a physical academic catalog is considered obsolete and no longer printed or maintained. My state ELR instructed there is no work-around for this and the submission of a physical/CD copy of the academic catalog is still required. The amount of time required for me to produce this on my own for a “check in the box” is significant and not a practical answer as I do not have the time to complete this task. Has the VA addressed or updated this policy to stay current with the academic institutions? If not, is it something soon to be addressed or updated to account for electronic academic catalogs and policies?

Submitting a catalog is a requirement by law. 38 U.S. Code § 3675 – the statute for accredited program approval, states “An educational institution shall submit an application for approval of courses to the appropriate State approving agency. In making application for approval, the institution (other than an elementary school or secondary school) shall transmit to the State approving agency copies of its catalog or bulletin which must be certified as true and correct in content and policy by an authorized representative of the institution.”

38 USC 3672(b)(2)(a) cites standard college degrees in public and not-for-profit institutions of higher learning are deemed approved providing specific statutory requirements are met. If a public or not-for-profit institution of higher learning had no non-college degrees, and no certificate programs, a catalog was not required. VA’s General Counsel subsequently provided guidance stating someone must determine programs meet the deemed approved statutory requirements. VA provided guidance to the State Approving Agencies (SAAs) on July 28, 2016, and requested the SAAs review the programs deemed approved and requested the SAAs ensure the specific statutory criteria required was met. Public Law 114-315, Section 408, signed on December 16, 2016, amends 38 USC 3672 and clarifies the role of the SAAs for the approval of programs outlined in 38 USC 3672.

Web-based catalogs are not acceptable because they can be easily changed without notice to the VA or SAA. Thumb drives are not acceptable, because they cannot be plugged into VA systems. If the school utilizes a web-based catalog, they must print a copy or move a copy to CD in pdf format, so the SAA and VA can see a specific point in time for the programs and policies outlined. Before you put the catalog on a CD, contact the SAA of your state to determine their policies and procedures for accepting a CD. As stated above, schools must certify a copy is true and correct.
11. You will provide evidence we attended this conference today?

We are not monitoring or tracking attendees for this webinar. However, your question and our response will be published.

12. For those who choose to use Post 9/11 instead of Montgomery GI Bill, are they able to get the money back from what they paid into for the Montgomery GI Bill?

An individual who made an irrevocable election from the Montgomery GI Bill (CH 30) to receive benefits under Post-9/11 GI Bill (CH 33), will receive a refund of their CH 30 contributions of up to $1,200.00 if entitlement is exhausted under CH 33.

13. How many times can a student repeat the same course and still receive benefits from VA?

Generally, a course successfully completed may not be recertified to VA. There are two exceptions. First, if a student fails a course or receives a grade where the program requires a higher grade than the one received, the course may be repeated and certified to VA again for payment. Courses repeatedly failed can result in a student not meeting the school’s academic progress standards. The school would then follow their academic progress standards and suspend or terminate the student accordingly.

The second exception is when the student is in their last term and enrolls in additional hours to increase their training time or rate of pursuit. Students may be recertified in a course previously successfully completed to round out their schedule up to fulltime status.

Rounding out a schedule can be done only once per program and must be the student's final term.

14. How can our learning organization register as a VA Course Codes – Non-College Degree at Institutions of Higher Learning (NAI).

There is not enough detail provided to adequately address this question. It is not clear if the institution is an IHL or NCD but does sound like they are seeking guidance on how to code programs in VA-Once. NCD Codes to be used at IHLs can be found in the SCO Handbook under “Appendix A: VA Objective and Course Code Listings”. Once can be provided your ELR. You can find your ELR by following the link below.


15. What is the difference between vocational training clock hours and college credits? We are a trade school.

They are both units of measurement with the most constructive difference being how approved and the requirements for certifying based upon the type of training. 38 CFR 21.4270(a) (1) covers in detail Trade and Technical courses. Generally, if training involves mostly shop practice then 22 clock hours per week is considered full-time and when theory and classroom instruction is how the majority of training is conducted then 18 clock hours is considered full-time. Similar courses offered at an institution of higher learning offered on a quarter- or semester-hour basis are measured in credit hours in the same manner as collegiate undergraduate courses.
16. If a student enrolls 6 credits in a standard term, they will receive 50% of BAH rate?

Under Chapter 33, a monthly housing allowance (MHA) is not payable when the student’s rate of training or (rate of pursuit) is exactly 50% or anything less than 50%.

17. Who is responsible for the upgrade percent with the forever GI bill effective January 1, 2013?

Most changes under the Forever GI Bill (Colmery Act, PL 115-48) are effective August 1, 2018, or later. Others may be much later, as with Section 105 which increases some benefit percentages for some individuals effective August 1, 2020. Likely, the question may be concerning Section 112; Post-9/11 GI Bill benefits will not expire for individuals last discharged from a qualifying period of service on or after January 1, 2013, and spouses using transferred benefits. Likewise benefits will not expire for all Fry spouses and a Fry child who first becomes eligible for Fry on or after January 1, 2013. This provision was effective upon passage of the legislation. We are actively notifying these individuals.

18. Will 1 or more days of Ch33 Post 911 GI Bill continue to pay the tuition/fees for the entire semester? And will the student Veteran receive the full BAH for the entire semester?

Generally, this scenario would be true provided the individual had not used other education benefits. Once an individual has used 48 months combined (or 81 months combined with Chapter 35 usage) under two or more programs, benefits are no longer payable.

19. I have a dual-veteran family: the husband is 100% P/T and is CH35 eligible. Can his wife who is active duty, use the CH35 under him while Active Duty? And/or can she use this in conjunction with TA?

No benefits under Chapter 35 will be provided during any period the otherwise eligible person is on active duty with the Armed Forces excluding any brief periods of ACDUTRA (Active Duty for Training) (38 CFR 21.3042(a)). If an applicant has served with the Armed Forces, his or her discharge or release from each period of service must have been under conditions other than dishonorable (38 CFR 21.3042(b)).

20. If a CH 33 student attends/participates the first day of class, but never again, and doesn't drop the class, and fails, it is a student debt, right?

A student must attend more than the first day of class to be entitled to Education benefit payments. Under Chapter 33, Tuition and Fee or Yellow Ribbon overpayments occurring as a result of a reduction or termination effective on or before the first day of training will be a school liability or school debt.

21. Will the Colmery GI Bill retroactively award CH33 rates, to include tuition costs and BAH, for those National Guard/Reserve members previously denied entitlement to CH33 due to the types of orders for which they were called to AD?

Sections 101 (added Title 10 Section 12301(H) service) and 401 (added Title 10 Sections 12304a and 12304b service) are not retroactive. These provisions are effective for training on or after August 1, 2018.
22. What is the new IHL Ch. 33 VA cap for private schools?

The rate for August 1, 2017-July 31, 2018, is $22,805.34. The rate for August 1, 2018- July 31, 2019, is $23,671.94. Click: Rate Tables

23. Will we receive reporting fees and if so what is the amount per student? Thank you.

The Annual Reporting Fee (ARF) amount is computed by multiplying the calendar year’s ARF rate by the number of eligible VA educational beneficiaries enrolled during the calendar year (38 USC 3684(c)). $7 (non-advance payment) and $12 (advance payment) per student from September 26, 2017, to September 25, 2026.

24. I was told by my ELR, Work Study students could not do SCO duties in VA Once. Is this correct?

It is possible to grant “Read Only Access” to work-study students. It is recommended SCO’s be employees of the facility. Please refer to Memorandum of Understanding for VA ONCE access.

25. FAA’s Airway Transportation Systems Special OJT program is 24 months. Can the employee be extended for a 12-month period based on the unavailability of the FAA Academy instructor-led classes? She still is NOT at a journey-level; she is currently a DEVELOPMENTAL.

Please contact your ELR. ELR Contact Information

26. This is our first term using the dual certification process. Do we report tuition and fees after the last day to drop with a “W” or the last day to drop with a full refund? When submitting a dual certification for a student who dropped a course, we only report the tuition and fees for the remaining active courses – correct?

- If the enrollment change occurs on or after the first day of the term-
  - An amendment should be submitted to report the tuition and fees for the original number of hours the student began the enrollment period with on the first day of the term
  - The next day, an adjustment should be submitted with the new hours and the tuition and fees associated with the new hours. (SCO Handbook under “Enrollment Changes under Post 9/11 after Tuition and Fees are Reported)
27. Please share the way for us to make changes to the GI Bill Comparison Tool when information has been changed.

Data on the GI Bill Comparison Tool (CT) consists of source data from the Department of Veterans Affairs (VA), as well as external agencies, such as the Department of Education (ED) and Department of Defense (DOD). VA updates the GI Bill Comparison Tool on a weekly basis. However, source data from external agencies usually occur monthly or annually. Based on the requested data change from a school, VA may or may not be able to update the information outside of the agency’s source data. Submissions for data changes can be forwarded to the following mailboxes: 224B.VBAVACO@va.gov or 223D.VBAVACO@va.gov. In addition, please refer to the following “GI Bill Comparison Tool (CT) School Request Response” guide below for instructions to contact ED and DOD about changes to school information as well.

GI Bill Comparison Tool (CT) School Request Response

If you would like to correct your institution information on the tool and it is NOT one of the below areas, please submit your changes directly on the site by clicking the light bulb at the bottom of the page. Otherwise, please contact the agency listed to update the information.

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28. How do you submit a catalog addendum?

Updates to facility information should be submitted through the State Approving Agency for the state of Jurisdiction. SAA Contact Information

29. We no longer have a catalog, only our website. What do we provide in place of the catalog?

A CD with the catalog (not a link) is acceptable; please contact your State Approving Agency for more information on catalog approvals. SAA Contact Information.

30. Is there an SCO discussion list/board where we can post general questions/share general information?

The VA does not have a SCO discussion board. The VA does have some interactive sites where information can be shared. Ask a Question (via Inquiry Routing & Information System [IRIS]); and Facebook. There are non-VA SCO sites where this type of sharing and information exchange takes place.
31. For prior credit in the current handbook, it states a transcript is required, but if it cannot be obtained and the student is matriculated to continue to certify. What does not being able to obtain transcript mean to the VA? If a student didn’t give this info during admissions and they are matriculated is a transcript still required?

Schools should make every effort to obtain transcripts to comply with the requirement to evaluate and grant credit where appropriate. However, if a transcript cannot be obtained, you may continue to certify enrollments as long as the student has matriculated. Reviews of prior credit policies will be conducted during compliance surveys and treated as approval issues if the school is not complying. SCO Handbook under “Courses Required for Admission to the Next Level of Training”.

32. Will SCOs get access to the WEAMS system to monitor months of entitlement, certifications, etc.?

WEAMS Public is a web-based approval program available to everyone. WEAMS Public has available basic facility information to include: Approved Programs, SCO information, BAH rate, and POE agreement. Months of entitlement for students is not available on WEAMS. SCO’s should have access to this information from the student with Award Letters and Certificates of Eligibility Letters.

The Harry W. Colmery Act– Section 308 requires the VA to make available to educational institutions information about the amount of educational assistance to which a student is entitled under chapter 30, 32, 33, or 35. Currently, this information is provided to educational institutions in VA-ONCE for Chapter 30,1606, and 1607. Chapters 33 and 35 are forthcoming. As of August 2018, a student pursuing a course of education may elect not to provide the information to an educational institution.