

Updated Frequently Asked Questions On the Yellow Ribbon Program 2015-16 Academic Year

These frequently asked questions (FAQs) augment existing information on the Yellow Ribbon Program for School Administrators and in the "School Certifying Official Handbook" on the GI Bill website at <http://www.benefits.va.gov/gibill/index.asp>. This list of FAQs will serve as an on-going resource and will be updated as needed.

The information on the Yellow Ribbon Program for school officials is available at http://www.benefits.va.gov/gibill/yellow_ribbon/yellow_ribbon_info_schools.asp. The "School Certifying Official Handbook" is available at http://www.benefits.va.gov/GIBILL/docs/job_aids/SCO_Handbook.pdf.

Question 1. What are the maximum tuition and fee amounts payable under the Post-9/11 GI Bill, and how does the Yellow Ribbon Program generally work?

Answer: There is a tuition and fee cap of \$21,084.89 for the 2015-16 academic year that can be paid towards net costs for tuition and fees at private and foreign schools. Yellow Ribbon Program benefits can be paid towards net tuition and fee costs not covered by the Post-9/11 GI Bill at a U.S. public or private institution of higher learning (IHL).

For public IHLs, the Post-9/11 GI Bill can cover up to 100% of the net in-State charges, and the Yellow Ribbon Program can be used to cover the remaining out-of-state charges for qualifying individuals.

Schools must report the actual net cost for in-state tuition and fees after the application of any waiver of, or reduction in, tuition and fees, and any scholarship, or other Federal, State, institutional, or employer-based aid or assistance (excluding Title IV aid) that is provided directly to the institution and specifically designated for the sole purpose of defraying tuition and fees. The key in determining the actual net cost for tuition and fees is excluding aid that is specifically designated for the sole purpose of tuition and fees.

The difference or a portion thereof between the actual costs for tuition and fees and the amount of Post-9/11 GI Bill funds can be met through matching contributions under the Yellow Ribbon Program for eligible students.

Question 2. How does Section 702 of the Veterans Access, Choice, and Accountability Act of 2014 (“Choice Act”) affect Yellow Ribbon Program benefits?

Answer: Since public IHLs will no longer be able to charge out-of-state tuition and fee rates to “covered individuals” meeting the requirements in 38 U.S.C. 3679(c), the Yellow Ribbon Program will not be applicable to those beneficiaries.

Question 3. How are the Post-9/11 GI Bill maximum tuition and fee amounts (cap) applied for private and foreign schools?

Answer: The cap is applied until it is exhausted. If the entire amount is not fully used in the first semester, then the remainder will be applied to cover all or a portion of costs for the subsequent semester. Once the amount of the cap has been exhausted for private schools, then the difference between what the Post-9/11 GI Bill covers and the tuition and fees charges could be met with YR Program funds (if the private school participates in YR) or with other financial aid. Please note that if the tuition and fees do not exceed the cap, then YR Program funds are not awarded. Likewise, a student attending part-time may not need YR Program funds.

Put another way, if the cap is fully applied in the first semester, then YR Program contributions can be applied to any potential shortfall in the first semester and for the remainder of the academic year for private schools.

Question 4. Will the cap for private and foreign schools increase each year?

Answer: The tuition and fee caps are recalculated annually, and changes are effective on August 1, the beginning of each new academic year. VA will update the GI Bill website with any adjustments to the cap.

Question 5. Are foreign schools ever eligible for the YR Program?

Answer: No, the YR Program is only available for U.S. institutions of higher learning, including branches located overseas.

Question 6. Are schools that do not offer a degree program eligible for the YR Program?

Answer: No, the YR Program is only available for U.S. institutions of higher learning, including branches located overseas.

Question 7. For public schools, can YR funds cover all of the out-of-state tuition and fees charges?

Answer: Yes, the YR Program could be used to cover the difference between the in-state and out-of-state tuition and fee charges.

Question 8. Does a Veteran or designated transferee have to be at the 100% benefit tier to be eligible for the YR Program?

Answer: Yes, only Veterans entitled to the maximum benefit rate (based on service requirements) or their designated transferees may receive this funding. Active duty servicemembers and their spouses are not eligible. Child transferees of active duty servicemembers may be eligible if the servicemember is qualified at the 100% rate. Spouses and children receiving Fry Scholarship benefits are not eligible for the Yellow Ribbon Program.

Question 9. How do you calculate YR Program contributions for part-time students?

Answer: The calculations for part-time students are the same as for full-time students. Any tuition and fees charged beyond the cap can be met or partially met through the YR Program.

Question 10. How should a school report tuition and fees (and YR Program contributions) to VA with respect to the cap?

Answer: The school should report actual net charges for tuition and fees as well as YR Program contributions. VA determines the payments for students.

Question 11. A student attended a private school for the fall semester and used the entire annual cap, and then transferred to a public school for the spring semester. Would that student have all tuition and fees covered at the public school, even though the cap was already exhausted at the private school? (This assumes the student at the 100% eligibility tier, not out-of-state, and properly certified.)

Answer: Yes, the student would have all in-state tuition and fees covered at the public school for the spring semester.

Question 12. A student attended a public school for the fall semester, and then the student transferred to a private school for the spring semester. Would that student be entitled to the full annual cap at the private school for the spring semester as well as YR Program funds?

Answer: Yes, the student would be eligible to receive up to the annual cap and YR Program funds (YR if charges for tuition and fees exceeded the cap for that semester).

Question 13. Does VA recommend any specific methodology regarding how schools should comply with the requirements for the YR Program (i.e. awarding, billing, etc.)?

Answer: No. The onus is on the school to comply with the terms of the YR Program agreement (beyond what is stipulated per regulation), and VA doesn't prescribe how a school meets the conditions. That way schools can develop their own methods that work best for the school. The school's Education Liaison Representative is a good

source of information and can describe how other schools comply with the requirements.

Question 14. Can a school eliminate students attending part-time from the first-come-first-served selection process for the YR Program? Can a school apply any minimum enrollment requirements on part-time students?

Answer: No, schools cannot eliminate part-time students from the first-come-first-served selection process. Also, a school cannot apply any minimum enrollment requirements as that also would violate the first-come-first-served selection process.

Question 15. Can a school limit its YR Program participation to apply only to students seeking their first undergraduate degree, for example, but not students seeking a second undergraduate degree?

Answer: No, as that is not permissible per the regulations (CFR Section 21.9700(d)) which do not permit distinctions based on the student's status (e.g. undergraduate, graduate, doctoral) or sub-element of the school (e.g. college or professional school), etc. Making a distinction of first versus second undergraduate degree would violate the "first-come-first-served" requirement, also within that section.

Example: a student may have already earned a BA while in the service, is injured in service, and upon release finds that he or she may have to alter his/her education in attempts to gain different employment given the injury, etc.

Question 16. Can a school treat a traditional versus a non-traditional program of study differently in its YR Program?

Answer: No, the school cannot differentiate between traditional versus a non-traditional program of study, such as the day and evening programs with the same course material. Therefore, the school cannot exclude the Undergraduate Adult Learning program, for example, while only including the traditional first degree undergraduate program where the difference is day versus night school.

Question 17. Can a school's policy state that the school will contribute YR Program funding towards a student's first attempt of classes, but for no successive attempts?

Answer: VA makes YR Program contributions for punitive grades, so if the student is receiving YR Program contributions initially, then the school must continue to contribute YR funding when he/she re-takes the class, provided that the following conditions apply:

- the school continues to participate in the program;
- the student continues to maintain satisfactory progress towards completion of the program (per the school's policy);
- the student remains continually enrolled (per the school's policy); &
- the student has remaining entitlement under the Post-9/11 GI Bill.

Question 18. Can a school modify or reduce its YR Program contribution after a student reduces the number of credits during a term, after the school previously certified the student at a higher number of credits with higher associated tuition and fee amounts? Also, can a school modify or reduce its YR Program contribution after a student withdraws during a term, after the school previously certified the student and YR contributions were made?

Answer: When a student reduces his/her credit hours, the school must report the tuition, fees, and YR Program contributions that would be payable for the number of credit hours the student has reduced to. The school is responsible for certifying to VA the amount of tuition and fees charged, as well as the amount of YR contributions payable. Please refer to the School Certifying Official Handbook for more guidance on calculating YR Program contributions and for reporting changes in a student's status.

Question 19. For purposes of the YR Program, can the school define the academic year as fall and spring only? Or is the participating school obligated to match the tuition gap for any YR eligible student who elects to attend for a summer term?

Answer: VA defines an academic year as August 1 through July 31. However, a school participating in the YR Program may designate how it will distribute its YR Program funding over the entire academic year.

Question 20. If a student is receiving Post-9/11 GI Bill and YR benefits for a summer class which starts in July, 2015, and ends in August, 2015, does that amount get deducted from the annual cap for the 2015-16 year?

Answer: No, the first day of the enrollment for a semester, quarter, or term establishes the academic year for that class. A semester, quarter, or term which begins prior to August 1, 2015 will be paid under the tuition and fees rules for the 2014-2015 academic year. Consequently, the amount will not be deducted from the 2015-2016 benefit cap.

Question 21. How does VA define the terms "direct grant" and "scholarship" relative to the school's contribution for the YR Program?

Answer: VA does not have specific definitions for the terms "direct grant" and "scholarship." Language under number 4 of the YR Program agreement provides information on school contributions. YR Program contributions cannot be loans, Title IV aid, or funds received by a third party that are not under the unrestricted control of the school. The term "unrestricted funds" refers to funding that is available to the IHL without any conditions on its use (i.e., designated for use by a specific individual or a specific group of individuals). However, funds received from a third party that are restricted for use in the YR Program may be counted towards the IHL's contributions to a YR Program participant.

Question 22. Is fundraising permitted to raise money for the school's contribution under the YR Program?

Answer: Yes. Fundraising for the YR Program and applying those funds towards the school's matching contribution is allowable. Schools participating in the program must agree to limit contributions made on behalf of a participant to funds under the unrestricted control of the school; funds specifically designated for a specific individual or group of individuals would be out of the control of the school, and, therefore, are not allowable for YR Program funding.

Question 23. Under what circumstances should an institution of higher learning (IHL) apply to participate in the YR Program?

Answer: A public school should apply for the YR Program if the school wants to have some or all of its out-of-state charges covered; the school should include the amount of out-of-state charges in the remarks section on VA Form 22-1999. A private school should apply for the YR Program if its tuition and fees exceed the cap for the academic year and the school wishes to have the YR Program make up all or part of the difference between the cap and the net amount of tuition and fees.

Question 24. When is the deadline to submit the YR Program agreement?

Answer: The Yellow Ribbon Program open season is offered yearly from approximately March 15th through May 15th. During the open season, institutions may (1) request participation in the program, (2) modify participation in the program, or (3) request withdrawal from the program. Since the Yellow Ribbon Program agreement is now open-ended, agreements will remain in effect until modified or withdrawn.

Schools should periodically check for announcements for the enrollment season at http://www.benefits.va.gov/gibill/yellow_ribbon/yellow_ribbon_info_schools.asp.

Question 25. Can an institution of higher learning (IHL) now use the YR Program agreement to indicate its commitment to adhere to the Principles of Excellence?

Answer: Yes, participating institutions that did not previously agree to adhere to the Principles of Excellence may update their agreement to indicate a commitment to adhere to the Principles of Excellence by completing the top section of the agreement, checking "modification to existing agreement", completing block 14, and signing appropriately or by submitting an email to principles.excellence@va.gov. Any addendum to the agreement or a separate email notification must also include the name, address, and facility code of each campus.

However, an institution may agree to adhere to the Principles of Excellence or may rescind its decision to adhere to the Principles of Excellence at any time by submitting an email to principles.excellence@va.gov.

Question 26. If there is a change to the names or contact information for either the institution's Authorizing Official, School Financial Representative/Yellow Ribbon

Program Point of Contact, or School Certifying Official, does the institution need to submit a modified agreement?

Answer: No, however, a modified agreement is required if there are any changes made to page 1 and/or to item number 9 or 14 of the agreement.

Question 27. Does a new school or a school that becomes separately approved (own facility code) need to wait for the open enrollment period to apply for the YR Program?

Answer: No, an institution under either such situation can apply for the YR Program as soon as it is approved for VA education programs and has its newly assigned facility code.

Question 28. Can an institution increase its matching contribution amount for the YR Program during the academic year?

Answer: No, an institution will only be permitted to change its maximum contribution amount (and other terms) for future years during the open season (approximately March 15th to May 15th each year). When determining the maximum matching contribution amount, institutions should attempt to account for potential increases in tuition and fees during the academic year. However, please note that per #8 of the agreement, the institution agrees to provide 'up to' X amount of the matching contribution; the institution may contribute a lesser amount if it is realistically appropriate.

Question 29. What are the responsibilities of a school participating in the YR Program and/or agreeing to adhere with the Principles of Excellence?

Answer:

1. Certifying in accordance with the school's YR Program agreement;
2. Maintaining records on the following:
 - tracking the number of students enrolled under the YR Program;
 - tracking the annual amount of the school's tuition and fees;
 - developing and documenting the process for the first-come-first-served enrollment of students into the YR Program;
3. For agreeing to adhere with the Principles of Excellence, the school must comply with the components of the executive order (see page 3 of the agreement for a listing of the Principles of Excellence).

Questions concerning participation in the YR Program should be directed to Yellow.Ribbon@va.gov.