

**VA**



U.S. Department  
of Veterans Affairs

## Education Service Office Hours

# Colmery Act Section 107 Recertification: Phase 2 Refresher Training



Target Audience: SCOs

June 2020



# Agenda

- **Section 107 Recertification Background**
- **Section 107 Recertification Waiver Overview**
- **Section 107 Recertification Process Overview**
- **Recertification Frequently Asked Questions**
- **Self Study Resources**

Remember: Please Open an Extra Web Browser or Smartphone to [Menti.com](https://www.menti.com)

# Section 107 Recertification Background

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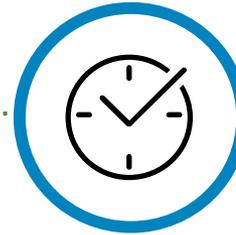
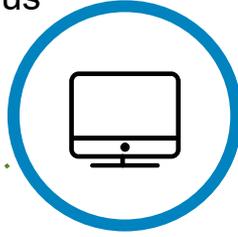
# Section 107 Recertification Background

**Section 107 of the Colmery Act requires that Monthly Housing Allowance (MHA) is paid based on campus location where a student attends the majority of classes, for any enrollment for a quarter, semester, or term, as applicable, beginning on or after August 1, 2018.**

*Note: The recertification process is applicable to Post-9/11 GI Bill (Chapter 33) students only.*

**December 1, 2019**

IT systems updated to calculate MHA in accordance with Section 107 *point forward*. All enrollments after 12/1 should be certified to the correct campus



**December 31, 2020**

All recertifications should be complete.



**May 26, 2020**

All schools have begun recertification. IT systems updated to allow SCOs to recertify enrollments in cases where the student was attending a different campus (i.e. extension campus) than originally provided to VA for terms with start dates on or after 8/1/2018 but no later than 11/30/2019

**August 1, 2018**

Colmery Act Section 107 went into effect



**Link to December Office Hours Presentation:** [December 1 Go-Live Recap](#)

**Link to April Recertification Training:** [Section 107 Recertification Training](#)

**Link to MHA toolkit:** [https://www.benefits.va.gov/GIBill/docs/FGIB/MHA\\_comms\\_toolkit.pdf](https://www.benefits.va.gov/GIBill/docs/FGIB/MHA_comms_toolkit.pdf)

# Section 107 Recertification Waiver Overview

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# Section 107 Recertification Waiver Overview

**ELIGIBILITY:** VA sent the [Facility Extension Campus Report](#) to schools that have extension campuses that qualify for a waiver to identify the qualifying campuses

**OVERVIEW:** The waiver will allow schools to forgo recertifying enrollments through VA-ONCE **if and only if:**

- The **enrollment** only includes an **extension campus(es)** that share the **same zip code** as the **main or branch campus** originally processed; **or**
- The **enrollment** only includes an **extension campus(es)** that share the **same Military Housing Area** as the **main or branch campus** originally processed; **and**
- The enrollment’s quarter, semester, or term start date is **between August 1, 2018 and November 30, 2019**

Term Start Date:	Extension Campus Location	Qualifies for Waiver?
August 1, 2018 – November 30, 2019	Same zip code or Military Housing Area as main or branch campus	YES
	Different Military Housing Area as main or branch campus	NO
After November 30, 2019	N/A	NO

If you have not received the Waiver Extension Campus Report, and you believe you have an extension campus eligible for waiver, please [contact your ELR](#) for directions on recertifying that campus

# Section 107 Recertification Process Overview

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# Recertification Best Practices

**VA has now begun accepting recertification of Chapter 33 enrollments from all schools. The 107 Recertification Process concludes December 31, 2020. When recertifying impacted enrollments, keep in mind these best practices:**



The Section 107 Colmery Recertification process applies to Post-9/11 GI Bill ® Students **only** (does NOT include other education benefits or Vocational Rehabilitation Ch31)



**Do not use the Colmery Termination reason for any other terminations**, all terminated enrollments due to Colmery **MUST** be replaced



Do not put any **Individual Remarks**, or any other remarks, within the standard remarks field



**Do not** submit any **amendments to the original** on the replacement enrollment. If an enrollment was amended, you will recertify the amendment.



**If an adjustment was made** to the original certification, the same adjustment will need to be made to the replacement



**Do not use the 107 Recertification process** to recertify a student to a different main/branch campus



**Recertify by student**, not by enrollment term



Remember to **Review Bio page** and update the “Training Type” field if necessary, and **add the student to the Extension Facility Code** where they took their classes, if they are not added already, in VA-ONCE



Make sure to **complete the Replacement** in VA-ONCE before moving on to anything else



# 107 Recertification Process



## SCO

### SCO TERMINATES Enrollment in VA-ONCE

1

- Use the list of students that you have tracked to identify enrollments and amendments for terms that begin on or after August 1, 2018 but before December 1, 2019 that require recertification
- Terminate the Enrollment/Amendment within VA-ONCE, using the appropriate Colmery Section 107 termination reason
- A standard Colmery 107 Remark will automatically appear

2

Term Name	Status	Facility Code	Begin Date Range	End Date Range	Filter
4X FALL 18			08/15/2018   12/15/2018	12   0	

1

3

5

4

6



# 107 Recertification Process



## SCO

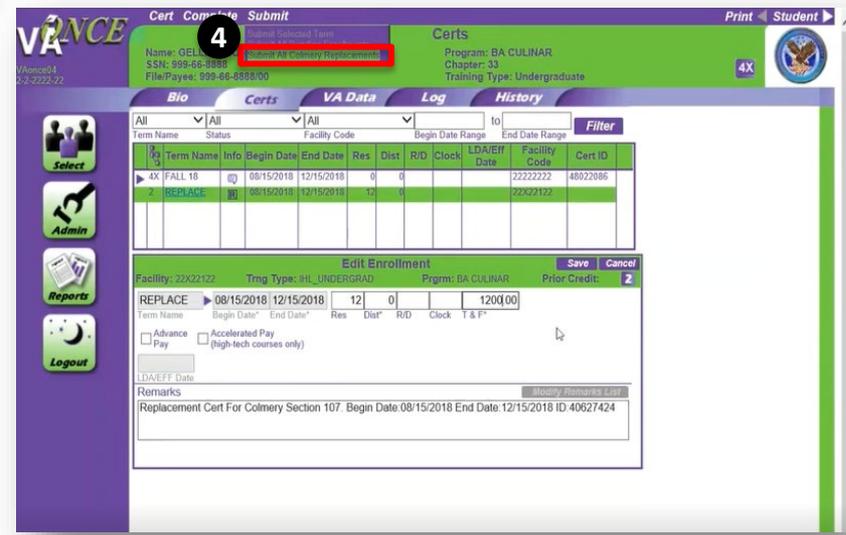
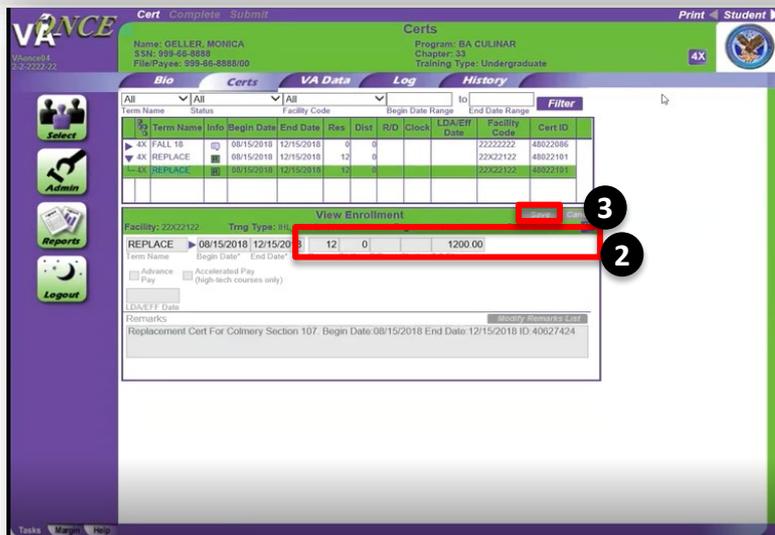
2

### SCO REPLACES Enrollment in VA-ONCE

- Add the replacement enrollment or amendment using the correct facility code
- Submit any adjustments



Keep in mind, repeat exactly what you did on the original enrollment on the replacement enrollment!





# 107 Recertification Process



VA

3

## VA REVIEWS Enrollment

- VA Education Systems and Veterans Claims Examiners will review and adjudicate the claim

4

## VA DISTRIBUTES Outcome to Beneficiary

- All impacted students will receive a letter from VA, stating if they were overpaid, no change, or underpaid:



### Payment Letter

All underpaid students will receive a lump sum MHA payment



### No Change Letter

Students whose MHA rate did not change will receive a “no change” notification



### Overpayment Letter

All students who had been overpaid in MHA will receive a letter indicating they have been overpaid



### COWC Letter

All overpaid students will have their claims automatically submitted to the Committee on Waivers and Compromise for review

**Note:** Overpayments for enrollment terms that start on or after 12/1/19 will be reviewed on a case-by-case basis

# Recertification Frequently Asked Questions

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# Frequently Asked Questions - Overview



**Recertification**



**Phase Assignments & Recertification Waivers**



**Clinicals/Practicums/Internships/Student Teaching**



**Overpayments/Letters**



**Facility Codes**

Please find full list of FAQs in the [Colmery Act Section 107 Questions and Answers document](#).



# Frequently Asked Questions - Recertification

## **Q. Which enrollments should I be recertifying? Do I need to recertify online/distance courses?**

**A:** SCOs should be recertifying enrollments where the student attended an extension campus for some or all of their courses but were certified to the main or branch campus instead, for terms with start dates from August 1, 2018 to November 30, 2019.

- If a student **only** took classes online, the enrollment does not need to be recertified. If a student took classes online and at an extension campus, they **DO** need to be recertified
- Some extension campuses are eligible for a recertification waiver for terms with start dates from August 1, 2018 to November 30, 2019. (See FAQs – Waivers slide)

## **Q. Should I be recertifying terms that started on or after December 1, 2019?**

**A:** All SCOs were instructed to certify enrollments with term start dates on or after December 1, 2019 to the approved campus location where a student is/was physically attending classes, including extension campuses. If you have certified enrollments incorrectly after this date, please [contact your ELR](#).

## **Q. What Termination Reason in VA-ONCE do I use to recertify?**

**A:** SCOs must use the “Colmery Section 107” termination reason when terminating an enrollment certification due to Section 107. This termination reason must only be used for Section 107 terminations. Enrollment certifications that are terminated using the “Colmery Section 107” termination reason must be replaced using the “Colmery Replacement” process. Step by step instructions on how to recertify enrollments in VA-ONCE can be found in the [Recertification Quick Reference Guide](#) and in demonstration videos, both of which can be found on the [School Resources Page](#).



# Frequently Asked Questions - Recertification

## **Q. Can I submit the replacement recertification on the same day as the termination?**

**A: Yes!** Replacement certifications **should be** submitted immediately after a Colmery Section 107 termination. Multiple 107 terminations and replacements can also be entered on the same day and are encouraged so students only receive one notification letter.

## **Q: Can I use the Section 107 recertification process to recertify a student to another main or branch campus?**

**A:** No. The Section 107 recertification process is only to be used when recertifying an enrollment term starting between August 1, 2018 and November 30, 2019 that was certified to a main or branch campus when the student was taking one or classes at an extension campus. The replacement enrollment must be certified to the appropriate campus.



# Frequently Asked Questions – Recertification

**Q. How do I recertify an enrollment for a term that was terminated for graduation/suspension/etc?**

**A:** This question is covered in the VA-ONCE recertification videos scenarios 6 and 7, which can be found on the [School Resources Page](#).

**Q. If I find a mistake in a past certification (such as T&F), can I correct it during recertification?**

**A:** No. SCOs must complete all standard reporting amendments or adjustments to the term before they start the recertification process. The information on the replacement enrollment(s) must match the original enrollment, except for the campus location(s).

**Note:** Making changes to the original enrollment, outside of campus location, may create school or student debts or additional payments depending on the type change reported. Once the enrollment is accurate, the SCO may begin the recertification process.

**Reminder:** The 107 Recertification Process should only be used to recertify enrollments where an individual was attending an extension campus instead of a main or branch campus on or after August 1, 2018. We recommend contacting your ELR if you have a complex enrollment period to correct or recertify for section 107.



# Frequently Asked Questions – Phase Assignments and Recertification Waivers

## Q. How do I know which extension campuses are eligible for a waiver?

A: Using the Extension Campus Report excel file, SCOs can enter their main or branch facility code to generate a list of extension campuses that are or aren't eligible for waiver. NOTE: If you believe any extension campus information is missing or incorrect, please [contact your ELR](#) for recertification guidance.

## Q. If my school has a waiver, do I have to submit any recertifications?

A: Entire schools do not receive waivers, but extension campuses within the same zip code or Military Housing Area are eligible for recertification waiver for terms with start dates of August 1, 2018 to November 30, 2019.

Extension Report										
<p><b>Extensions eligible for recertification waiver.</b> Only terms starting on or after 8/1/2018 but before 12/1/2019 are eligible for waiver. If a student was certified to the main/branch campus for a term that started on or after 12/1/2019, but attended one of these campuses, that enrollment must be recertified.</p>					<p><b>Extensions NOT eligible for recertification waiver.</b> Recertify <u>ALL</u> enrollments for terms starting on or after 8/1/2018 where the student attended one or more of these campuses and was certified to the main/branch campus.</p>					
					<b>Enrollments at priority campuses should be prioritized</b>					
Facility Code	Extension Name	Address	City	Zip	Facility Code	Extension Name	Address	City	Zip	Indicator
11X01719	UNIVERSITY COLLEGE AT BATH BRUNSWICK	12 SEWALL ST	BRUNSWICK	04011	11X00419	MSAD 35 ADULT AND COMMUNITY ED	260 DOW HIGHWAY	SOUTH BERWICK	03908	Priority
11X06219	LEWISTON AUBURN COLLEGE	51 WESTMINSTER ST	LEWISTON	04240	11X00919	SOUTHERN MAINE REENTRY CENTER	2 LAYMAN WAY	ALFRED	04002	Priority
11X06319	LISBON ADULT AND COMMUNITY ED	19 GARTLEY ST	LISBON	04252	11X01819	CROOKED RIVER ADULT EDUCATION	1437 POLAND SPRING ROAD	CASCO	04015	Priority
11X06419	SPRUCE MOUNTAIN ADULT ED	25 CEDAR ST	LIVERMORE FALLS	04254	11X02819	MAINE CORRECTIONAL CENTER SCHOOL	17 MALLISON FALLS RD	WINDHAN	04062	Priority



# Frequently Asked Questions Clinicals/Practicums/Internships/Student Teaching

**Q.** How should I recertify terms where the student was in a clinical/practicum/internship/student teaching/etc.?

**A:** Off-campus trainings should NOT be recertified using Section 107. Enrollments that include off-campus training (including internships, practicums, externships, clinical rotations, and residencies), should be certified to the location of the campus where the student is enrolled, as long as the “off-campus training site” does not meet VA’s campus definition requirements.

Link: [campus definitions](#)



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## Campus Definitions Reference Guide

- A main campus and an extension campus can be located in the same zip code.
- The extension campus will have a different VA-assigned sub-facility code than the main campus.

- An extension campus can be geographically separate (e.g. in a different zip code) or physically separate (e.g. a different building within the same zip code) from a main or branch campus.
- Any training location that crosses state lines where a student is physically attending classes must be approved by the SAA in the respective state; if an extension location has administrative capabilities it may be approved as a stand-alone campus in the state.
- Extension campuses of a US based school that are located in foreign countries may be approved by the SAA of the associated main or branch campus.

### Key

- 
**BRANCH CAMPUS:**  
 A location of an educational institution that is geographically apart from and operationally independent of the main campus of the educational institution; has its own administration; and offers courses leading to a degree or other recognized education credential.
- 
**EXTENSION CAMPUS:**  
 A location of an educational institution that is geographically apart from and is operationally dependent on the main campus or a branch campus of the educational institution.
- 
**MAIN CAMPUS:**  
 A location where the primary teaching facilities of an educational institution are located.

**SCHOOL CERTIFYING OFFICIALS ARE NOT REQUIRED TO DEFINE CAMPUS TYPE.** Schools must submit their campuses to their SAA, who will make this determination. **38 C.F.R. § 21.4266(a)(3)-(5)** provides VA's general definition guidance for these campuses. It is the sole discretion of the SAAs to determine whether a campus qualifies as an extension campus.



# Frequently Asked Questions – Overpayments/Letters



## GI Bill Students: You may receive a letter about Monthly Housing Allowance (MHA) rate adjustments.

On December 1, 2019, the Department of Veterans Affairs (VA) updated education claims processing systems to pay MHA in accordance with the Colmery Act. With this change, MHA is paid based on the physical campus location where a student attends the majority of his or her classes. Previously, students were paid MHA based on the location of the main or branch campus of the school where enrolled.

Starting in April 2020, VA began working with schools to correct location-based housing for students who were paid under the old rules since August 1, 2018, when the law went into effect. As schools recertify enrollments for impacted students, VA will notify students about any associated MHA adjustments.



### Did you attend classes outside the main campus of your school for a term beginning on or after August 1, 2018?

VA is working with schools to determine if you were underpaid, overpaid\* or not impacted by attending classes at a campus location other than your school's main campus since August 1, 2018. As VA receives new information from schools between now and the end of calendar year 2020, you may receive a letter.

- 1 If you were paid correctly, you will be sent a **No Change Letter** stating you were paid correctly.
- 2 If you were underpaid, you will be sent a **Payment Letter** stating you were underpaid and you will receive a lump-sum payment, regardless of start date. There is no action necessary on your part.
- 3 If you were overpaid\*, you will be sent an **Overpayment Letter** stating you were overpaid. VA will review the claim for waiver of the debt and provide additional information on this process. GI Bill students who were overpaid solely as a result of the delay in MHA rate changes will not owe money to VA.

Learn about these changes with the [MHA Rate Change Infographic](#) and estimate your MHA using the [GI Bill Comparison Tool](#).

\*VA will review all overpayments on a case-by-case basis.



## Q. Will students receive overpayment letters from recertification?

A: Recertification resulting in overpayments will generate overpayment letters to students using similar language to the December 1 go-live letters. SCOs are welcome to share the [MHA Adjustment Letters infographic](#) with students to help explain these letters. GI Bill ® students who were overpaid solely as a result of the delay in MHA rate changes (including 107 Recertification) will not owe money to VA

## Q. Will students receive notifications (email/letter) when we terminate their enrollment and submit a new enrollment?

A: Post-9/11 GI Bill ® students will not receive the standard email or letter notification for 107 termination and replacement enrollments. Instead, they will receive a letter after the 107 replacement enrollments are processed, which is why it is important to complete recertifications by student. By completing a student in one sitting, it helps ensure the student receives only one letter and one lump-sum payment (if applicable)

## Q. Should we be notifying students before we recertify their enrollments?

A: VA has notified potentially impacted students, but SCOs are often the first point of contact with students. We welcome SCOs to share the [MHA Adjustment Letters infographic](#) and let students know if they are on your list for enrollment recertification



## Frequently Asked Questions – Facility Codes

**Q. I have an extension campus that does not have a facility code; how do I get a facility code so I can recertify students who attended there?**

**A:** If an extension campus does not have a facility code, your school should contact your State Approving Agency immediately to begin, or check on, the approval status of the facility. Once the SAA approves an extension campus, the ELR will assign a facility code, then enter it into WEAMS and VA-Once for your access. Per VA policy, students should be certified to the location where they physically attend classes. VA cannot pay benefits for a GI Bill student attending a class at a location that is not approved by the SAA

**Q. I have a foreign campus that was recently issued a facility code, should I be recertifying students who attended classes at the foreign campus?**

**A:** If your school's foreign campus was issued an *extension site facility* code as a result of the Colmery Act Section 107 (location-based housing), students who attended that campus for terms with start dates on or after August 1, 2018, should be recertified using the same process as outlined for extension campuses. This will adjust their Monthly Housing Allowance rate to Foreign Rate MHA for the impacted terms

**Note:** Students will receive a letter explaining the difference in the MHA amount

**Note:** If you have additional questions that have not been answered, please [contact your ELR](#)



# Knowledge Check

Please go to [www.Menti.com](https://www.Menti.com) and use the code listed in the **Info Pod** to participate!



# Recertification Self Study Resources

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# Navigating the School Resources Page

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VA Benefits and Health Care About VA Find a VA Location

Home > School administrators

## Resources for schools

Resources for schools is a one-stop shop for School Certifying Officials (SCOs) and school administrators assisting students who are using their VA benefits to pursue education and training programs. Find trainings, resources, guides, and information on GI Bill programs to support military-connected students.



[School Certifying Official \(SCO\) Handbook](#)

Revision 5.6.5, current as of January 31, 2020

Ask questions

**On this page**

- [Training and guides](#)
- [Upcoming events](#)
- [Policies and procedures](#)
- [Resources to support students](#)

## Training and guides

Use these resources to get training and boost your skills to help support military-connected students.

**Required training for SCOs** >  
Required if your school has 20 or more GI Bill students

**Essentials for SCOs**

- [School Certifying Official Handbook](#) >
- [Vocational Rehabilitation and Employment \(VR&E\) SCO Handbook](#) >
- [Vocational Rehabilitation and Employment \(VR&E\) Tungsten](#) >
- [Vocational Rehabilitation and Employment \(VR&E\) Tungsten](#) >
- [VA-ONCE Quick Reference Guide](#) >
- [Understanding On-The-Job Training and Apprenticeship Approval](#) >
- [Find your Education Liaison Representative \(ELR\)](#) >
- [Training webinars](#) >
- [Public WEAMS](#) >
- [Benefits A to Z](#) >

**Training Webinars**

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[VA Education Call Center: 888-442-4551](#)

[Outside the U.S.: +1-918-781-5678](#)

[Call MyVA311 for help: 844-698-2311](#)

## Upcoming Webinars

### APRIL 2020 - 107 Recertification Training

VA will host virtual training sessions to walk through the 107 recertification process for Phase 1 and Phase 2 schools. Invites will be sent via Gov.Delivery. Registration is required.

This phased approach is based on several factors, including feedback from schools regarding the time it would take to complete recertification, as well as a commitment to making students whole who were underpaid.

**Phase 1** (Begins April 29, 2020 through the end of calendar year 2020): All schools with an extension campus with a higher Monthly Housing Allowance (MHA) than the associated main or branch campus, and the top 60% of schools with enrollments at extension campuses that require recertification based on VA data since December 1, 2019.

**Phase 2** (Begins May 26, 2020 through the end of calendar year 2020): All other schools.

**Training topics will include:**

- 107 Recertification Timeline
- 107 Recertification Waiver
- 107 Recertification Process
- VA-Once Demo
- Next Steps

Training will count toward the SCO Annual Training requirement. To earn credit a profile needs to be created on the [SCO Training portal](#) on the GI-Bill website

**VA-ONCE DEMOS**

[Section 107 Recertification Training](#)

Videos:

- Prerequisite Scenario: [Adding facility code](#)
- Recertification Scenario 1: [All hours recertified at extension campus](#)
- Recertification Scenario 2: [Half hours recertified at extension campus](#)
- Recertification Scenario 3: [Hours recertified at multiple extension campuses](#)
- Recertification Scenario 4: [Hours reduced and recertified at main and extension campus](#)
- Recertification Scenario 5: [Hours reduced and recertified at multiple extension campuses](#)
- Recertification Scenario 6: [Recertifying a terminated enrollment](#)
- Recertification Scenario 7: [Recertifying a terminated enrollment with hours at main and extension campus](#)

[Section 107 Recertification VA-ONCE Quick Reference Guide](#)

[Facility Extension Campus Report \(interactive spreadsheet\)](#)



# Section 107 Recertification Resources

## Recertification Scenarios

**Scenario 1:** Recertifying all credit hours from the main campus to an extension campus

**Scenario 2:** Recertifying half the credit hours from a main campus to an extension campus when an amendment was done to add T&F

**Scenario 3:** Recertifying all credit hours from the main campus to multiple extension campuses

**Scenario 4:** Recertifying a term that had hours reduced at the main campus to take hours at both the main campus and extension campus with replacing the reduction

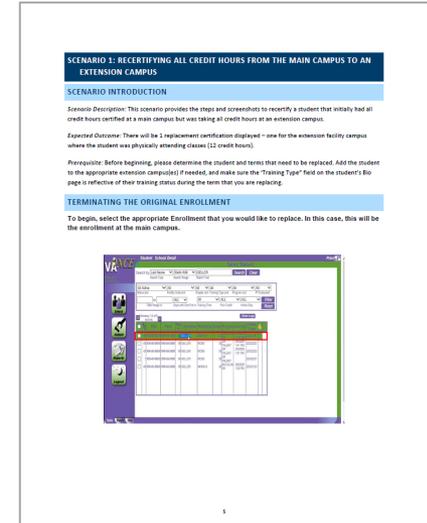
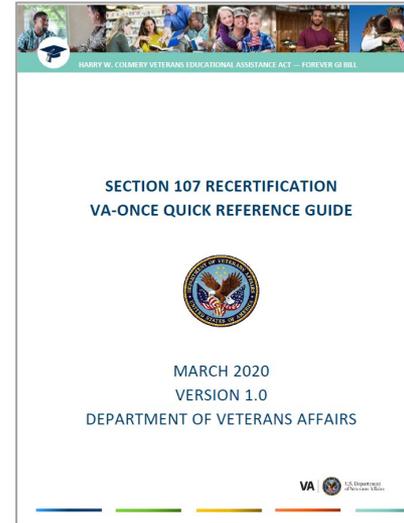
**Scenario 5:** Recertifying a term that had hours reduced and classes were being taken at 2 extension campuses and replacing the reduction with a termination

**Scenario 6:** Recertifying a term that was terminated for graduation where the student was taking classes at both the main and extension campus

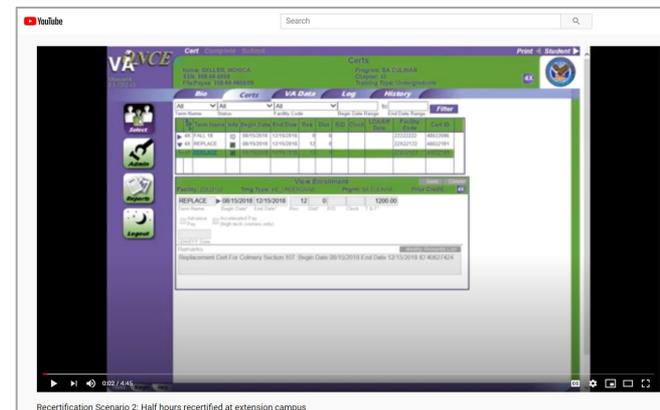
**Scenario 7:** Recertifying a term that was terminated for Withdrawal Non-Punitive where the student was taking classes at both the main and extension campus

**New! Scenario 8:** Recertification of an enrollment certified at the main campus with an adjustment to add hours taken at a different campus from where the original hours were taken

## Recertification Quick Reference Guide



## Recertification Videos





# Section 107 Recertification Resources

**VA has developed a series of tools and resources to explain the 107 Recertification process and GI Bill ® benefit updates**

Resource	Link
Colmery Act Section 107 Recertification Presentation	<a href="https://www.benefits.va.gov/GIBILL/docs/presentations/Colmery_107_Recertification_SCO_Training.pdf">https://www.benefits.va.gov/GIBILL/docs/presentations/Colmery_107_Recertification_SCO_Training.pdf</a>
VA-ONCE Recertification Demo Videos	<a href="https://www.benefits.va.gov/gibill/resources/education_resources/school_certifying_officials/presentations.asp">https://www.benefits.va.gov/gibill/resources/education_resources/school_certifying_officials/presentations.asp</a>
Recertification VA-ONCE Quick Reference Guide	<a href="https://www.benefits.va.gov/GIBILL/docs/presentations/107_Recertification_VAONCE_QuickRefGuide.pdf">https://www.benefits.va.gov/GIBILL/docs/presentations/107_Recertification_VAONCE_QuickRefGuide.pdf</a>
Facility Extension Campus Report	<a href="https://benefits.va.gov/gibill/docs/fgib/recertificationwaivers_extensioncampusreport.xlsx">https://benefits.va.gov/gibill/docs/fgib/recertificationwaivers_extensioncampusreport.xlsx</a>
Frequently Asked Questions Document	<a href="https://www.benefits.va.gov/gibill/docs/fgib/fgib_stakeholder_faqs.pdf">https://www.benefits.va.gov/gibill/docs/fgib/fgib_stakeholder_faqs.pdf</a>
VA Education and Training Web Page	<a href="https://benefits.va.gov/gibill/">https://benefits.va.gov/gibill/</a>
VA Education and Training Benefits Frequently Asked Questions	<a href="https://gibill.custhelp.va.gov/app/answers/list">https://gibill.custhelp.va.gov/app/answers/list</a>
GI Bill ® Comparison Tool	<a href="https://www.va.gov/gi-bill-comparison-tool/">https://www.va.gov/gi-bill-comparison-tool/</a>
Forever GI Bill ® : Monthly Housing Allowance Guide (For Students)	<a href="https://www.benefits.va.gov/GIBill/docs/FGIB/MHA_student_guide.pdf">https://www.benefits.va.gov/GIBill/docs/FGIB/MHA_student_guide.pdf</a>
Forever GI Bill ® : Communications Toolkit	<a href="https://www.benefits.va.gov/GIBill/docs/FGIB/MHA_comms_toolkit.pdf">https://www.benefits.va.gov/GIBill/docs/FGIB/MHA_comms_toolkit.pdf</a>