

SEPTEMBER 17TH QUESTIONS – CELO, ELR, VACO

HYBRID TRAINING QUESTIONS

Q. Remedial and deficiency courses offered by independent study cannot be approved [§21.4267(g)]. Since the definition of independent study has changed for certification as well as for approval purposes, can deficiency/remedial courses offered in a hybrid format or offered solely through distance learning be approved for VA purposes?

A. No. Per CFR 21.4267(g) VA does not approve any Remedial/Deficiency courses that are not taught 100% resident in classroom. Since they cannot be approved unless offered as 100% in residence the changes regarding hybrid courses do not apply to Remedial/ Deficiency courses as there should not be any Hybrid remedial/ deficiency courses approved.

Q. About remedial courses. Do these definitions have any impact on the approval of remedial courses? The current CFRs do not allow them to be approved if offered through independent study. That has also included online training. Are we saying that a remedial course which has only one class meeting during a term can be approved?

A. The change to certifying Hybrid courses only applies to how we certify courses, as the change was based on 38 U.S.C. § 3313(c)(1)(B)(iii) and (g)(3)(A)(ii)(I)(bb) regarding what VA education beneficiaries are due in the way of payment for hybrid. There have been no changes to the approval procedures for these courses.

Q. Courses taught using closed circuit TV are now considered "distance" training whereas previously, they were considered "resident." The reason for this was because students are required to attend a class in which they use CCTV to communicate with their instructor. It seems that now, the notion of the location of the instructor outweighs the required on-campus attendance of the student. Is this correct?

A. Based on 38 CFR 21.4233(c)(2): *Closed circuit telecast*. Instruction offered through closed circuit telecast which requires regular classroom attendance is to be recognized to the same extent as regular classroom and/or laboratory instruction. As long as, all students are going on campus to watch training via technology it can be certified as in residence.

Note: If students come to the campus and attend in classroom, SCOs can certify as in residence. Even if its optional and students come to campus to attend, SCOs can certify it as in residence. However, a faculty member must be monitoring the attendance. If there is no school faculty monitoring the sign in sheets, then the school could be held liable for false certification.

Q. What happens if a student is in a classroom and instruction is provided via a video connection with the professor at another location, is that still considered distance learning?

A. Based on 38 CFR 21.4233(c)(2): *Closed circuit telecast.* Instruction offered through closed circuit telecast which requires regular classroom attendance is to be recognized to the same extent as regular classroom and/or laboratory instruction. As long as, all students are going on campus to watch training via technology it can be certified as in residence.

Note: If students come to the campus and attend in classroom, SCOs can certify as in residence. Even if its optional and students come to campus to attend, SCOs can certify it as in residence. However, a faculty member must be monitoring the attendance. If there is no school faculty monitoring the sign in sheets, then the school could be held liable for false certification.

Q. Can attendance for a hybrid class be at any point in the term for the one physical meet up?

A. Yes, As stated on page 58 of the SCO Handbook, for terms beginning on or after August 15, 2019, you will certify all courses which contain any in-residence component as in-residence training. This means all (hybrid) training which combines residential and distance learning will be certified as in-residence.

Q. I would like to confirm that this also applies to hybrid remedial courses

A. No. Per CFR 21.4267(g) VA does not approve any Remedial/Deficiency courses that are not taught 100% resident in classroom. Since they cannot be approved unless offered as 100% in residence the changes regarding hybrid courses do not apply to Remedial/ Deficiency courses as there should not be any Hybrid remedial/ deficiency courses approved.

Q. How does the update to hybrid classes impact "Remedial" Math/English Classes?

A. No. Per CFR 21.4267(g) VA does not approve any Remedial/Deficiency courses that are not taught 100% resident in classroom. Since they cannot be approved unless offered as 100% in residence the changes regarding hybrid courses do not apply to Remedial/ Deficiency courses as there should not be any Hybrid remedial/ deficiency courses approved.

Q. If a course has no instructor class time, so the class never meets with the instructor in a group setting, but has required student group meetings, is that considered residence?

A. No, without an instructor present this cannot be considered in class residence training.

Q. Hawaii Community College requires that all online courses have 1 test administered in person. Does this mean that All online courses be certified as In-Resident?

A. Yes, if it's a mandatory class meet up that is instructor led, then it can be certified as in residence.

Q. What if a class meets every other week for undergraduate?

A. Yes, As stated on page 58 of the SCO Handbook, for terms beginning on or after August 15, 2019, you will certify all courses which contain any in-residence component as in-residence training. This means all (hybrid) training which combines residential and distance learning will be certified as in-residence.

Q. What if the class doesn't meet on campus but is not online either... like a ride along in an ambulance or working in a hospital?

A. Yes, practical training may be certified as in residence if all criteria is met for approval under CFR 21.4265(f)

Q. Hybrid course section: Can we use a syllabus that shows a mandatory meeting during the first week of classes for a web course to certify as in residence?

A. Yes, As stated on page 58 of the SCO Handbook, for terms beginning on or after August 15, 2019, you will certify all courses which contain any in-residence component as in-residence training. This means all (hybrid) training which combines residential and distance learning will be certified as in-residence.

Q. What about online courses that have a clinical learning component?

A. Yes, practical training may be certified as in residence if all criteria is met for approval under CFR 21.4265(f)

Q. Do required meetings outside of a classroom setting (e.g. required site tours or interviews on location) count as making an otherwise online course a hybrid course based on this update?

A. No, without an instructor present and without credits attached this cannot be considered in-residence training.

Q. Our term began August 12. Do we adhere to courses that began on or after August 15 but not courses that began on August 12-14 25?

Yes, for terms beginning on or after August 15, 2019, you will certify all courses which contain any in-residence component as in-residence training. If you have any terms with a start date of August 14, 2019 or earlier, the change regarding hybrid courses cannot be applied to those terms.

Q. Can you please speak to the requirement as far as a "mandatory" meeting in each course? As an example, if there is an Orientation on day one of the course does it have to be required for all students or can it be optional, but VA students must attend if they want to be certified as in resident.

A. As stated on page 58 of the SCO Handbook, for terms beginning on or after August 15, 2019, you will certify all courses which contain any in-residence component as in-residence training. This means all (hybrid) training which combines residential and distance learning will be certified as in-residence. If the in -residence component (orientation) is optional, then there must be a sign in sheet for the class session to show the Veteran student attended and that sign sheet should be saved to the student's file for SCOs to certify the course as in-residence.

Q. If a graduate student is meeting a thesis chair during set meeting times during the semester does that count as residence, even if there is no class time recorded in the schedule?

A. Yes, according to CFR 21.4267(e) (2) for graduate training, preparation of a student's master thesis can be considered resident training.

Q. Math 86 is a hybrid that meets Tuesday and Thursday 9:am to 10:00 am can the class be certified has a seat class?

Assuming, Math 86 is remedial. VA does not approve any Remedial/Deficiency courses that are not taught 100% resident in classroom. Since they cannot be approved unless offered as 100% in residence the changes regarding hybrid courses do not apply to Remedial/ Deficiency courses as there should not be any Hybrid remedial/ deficiency courses approved.

Q. Our institution has remedial courses offered as hybrid, which we have not certified in the past due to the online component. They do have a classroom component - are they certifiable now?

No. Per CFR 21.4267(g) VA does not approve any Remedial/Deficiency courses that are not taught 100% resident in classroom. Since they cannot be approved unless offered as 100% in residence the changes regarding hybrid courses do not apply to Remedial/ Deficiency courses as there should not be any Hybrid remedial/ deficiency courses approved.

Q. If there is a remedial course that has online instruction but in-person testing requirements on our campus, should this be certified as an in-person course or not certified because it is a distance learning remedial course?

No. Per CFR 21.4267(g) VA does not approve any Remedial/Deficiency courses that are not taught 100% resident in classroom. Since they cannot be approved unless offered as 100% in residence the changes regarding hybrid courses do not apply to Remedial/ Deficiency courses as there should not be any Hybrid remedial/ deficiency courses approved.

Q. What if a web course requires proctored exams to be taken in the schools testing center?

A. If the testing is at a formal university site and if it's proctored by university officials, then it's certifiable as in-residence. If students are meeting randomly at off campus sites to test then it should not be certified as in-residence.

Q. What documentation is required to prove the student will have contact with the instructor for an Individual Study?

A. If a student is taking a course that is hybrid, and the resident portion is optional, then a school must have a sign in sheet/attendance sheet to show the students attended the classroom training and place a copy in the student's file. Note: A faculty member must be monitoring it the attendance. If there is no school faculty monitoring the sign in sheets, then the school could be held liable.

Q. What would Thesis be classified as?

A. According to CFR 21.4267(e) (2) for graduate training, preparation of a student's master thesis can be considered resident training. But a classroom session or meet up must takes place during the term or it cannot be certified as in-residence.

Q. Does the "any class taught hybrid method" include remedial coursework?

A. No. Per CFR 21.4267(g) VA does not approve any Remedial/Deficiency courses that are not taught 100% resident in classroom. Since they cannot be approved unless offered as 100% in residence the changes regarding hybrid courses do not apply to Remedial/ Deficiency courses as there should not be any Hybrid remedial/ deficiency courses approved.

Q. Does the hybrid definition also apply to NCD programs or only IHL?

A. NCD course still must meet NCD specific approval regulations. As long as, approval regulations are met and they have one meet up, then yes, they can be certified in residence.

Q. We have courses were our students are in a physical classroom but there are being instructed through TV from a professor at another location. This should still be considered in residence, correct?

A. Based on 38 CFR 21.4233(c)(2): Closed circuit telecast. Instruction offered through closed circuit telecast which requires regular classroom attendance is to be recognized to the same extent as regular classroom and/or laboratory instruction. If all students are going on campus to watch training via technology it can be certified as in residence.

Note: If students come to the campus and attend in classroom, SCOs can certify as in residence. Even if its optional and students come to campus to attend, SCOs can certify it as in residence. However, a faculty member must be monitoring the attendance. If there is no school faculty monitoring the sign in sheets, then the school could be held liable for false certification.

Q. Did the presenter state that "any class taught by hybrid method should be certified in resident? If so, do remedial courses fall under this new rule?

A. No. Per CFR 21.4267(g) VA does not approve any Remedial/Deficiency courses that are not taught 100% resident in classroom. Since they cannot be approved unless offered as 100% in residence the changes regarding hybrid courses do not apply to Remedial/ Deficiency courses as there should not be any Hybrid remedial/ deficiency courses approved.

Q. What if an online class requires on campus testing?

A. If it's at a formal university site and if it's proctored by university officials, then it's certifiable as in-residence.

Q. Under Example 2; does the meeting times need to be stated in the school Catalog or under the course information listed online?

A. A facility is not required to list the specific date of meet up, but they must provide evidence of the physical attendance upon request of the ELR or ECSS/surveyor.

Q. If the instructional meeting(s) with the professor occurs outside of a true "classroom," (for example in a coffee shop, in the professor's office) is this considered residential?

A. If it's at a formal university site and if it's proctored by university officials then it's certifiable. It should be a formal meet with a professor.

Q. Where can we find a list of future webinars?

**A. Please go to the School Certifying Officials (SCOs) Information page on the VA Benefits website:
https://www.benefits.va.gov/gibill/resources/education_resources/school_certifying_officials/sco_info.asp**

Q. Is this also true for chapter 31 (Vocational Rehabilitation)?

A. Please go to the Vocational Rehabilitation and Employment website for questions about Voc Rehab. <https://www.benefits.va.gov/vocrehab/index.asp>

Q. If a course was certified as hybrid, but would not change a beneficiary's eligibility, would an adjustment still be required?

A. I believe this is asking, if a veteran's payments would not be changed by adjusting the hybrid courses from distance learning to residence then is it necessary to adjust. Yes, adjustments should be made. Certifying hybrid courses as in -residence for terms beginning on or after August 15, 2019 is the correct way to certify based on procedural changes.

Q. What if the class is coded as Distance but then after the syllabus is submitted to the SCO you discover there are physical meet ups for the student - so the SCO Adjusts the class from Distance to Residence with proof of the syllabus. Would this be a False Certification problem? Would the school be liable?

A. If there is proof to show the course can be certified as in-residence, then this would not be a false certification issue.

Q. Does example 3 apply to undergraduate courses as well? If a course meets once, and the rest is completed online, should it be certified as in-residence?

A. Yes, As stated on page 58 of the SCO Handbook, for terms beginning on or after August 15, 2019, you will certify all courses which contain any in-residence component as in-residence training. This means all (hybrid) training which combines residential and distance learning will be certified as in-residence.

Q. To confirm, for undergraduate courses that are listed as hybrid in our schedule posting that have at least 1 meeting on campus within the scheduled dates of term, then continue with balance online, we can certify those as residential?

A. Yes, As stated on page 58 of the SCO Handbook, for terms beginning on or after August 15, 2019, you will certify all courses which contain any in-residence component as in-residence training. This means all (hybrid) training which combines residential and distance learning will be certified as in-residence.

Q. On Example 2, are papers considered midterms and finals in an independent study writing course?

A. If there is one meet up where the student is obligated to come on campus and meet with their professor, then it can be certified as in residence.

Q. If a class is online but requires in-person testing, but doesn't meet in person on the first day of class, would this be considered Distant learning?

A. If there is one meet up during the term where the student is obligated to come on campus and meet with their professor it can be certified as in residence. If the testing is at a formal university site and if it's proctored by university officials, then it's certifiable as in-residence.

Q. My understanding is that all hybrid classes are to be certified as in-residence. Does this apply to developmental classes as well?

A. No. Per CFR 21.4267(g) VA does not approve any Remedial/Deficiency courses that are not taught 100% resident in classroom. Since they cannot be approved unless offered as 100% in residence the changes regarding hybrid courses do not apply to Remedial/ Deficiency courses as there should not be any Hybrid remedial/ deficiency courses approved.

Q. Does the new definition of an online course apply to remedial coursework? Or are we still not allowed to certify a remedial course that has online instruction but in-person testing?

No. Per CFR 21.4267(g) VA does not approve any Remedial/Deficiency courses that are not taught 100% resident in classroom. Since they cannot be approved unless offered as 100% in residence the changes regarding hybrid courses do not apply to Remedial/Deficiency courses as there should not be any Hybrid remedial/ deficiency courses approved.

Q. If students are in the classroom, but the professor is elsewhere (simulcast) is this considered an in-residence course?

A. Yes, it is certifiable as long as it's a formal offering by the school and there has to be some method to prove that the student attended the on-campus video training.

Based on 38 CFR 21.4233(c)(2): Closed circuit telecast. Instruction offered through closed circuit telecast which requires regular classroom attendance is to be recognized to the same extent as regular classroom and/or laboratory instruction.

As long as all students are going on campus to watch training via technology it can be certified as in residence.

Note: If students come to the campus and attend in classroom, SCOs can certify as in residence. Even if its optional and students come to campus to attend, SCOs can certify it as in residence. However, a faculty member must be monitoring the attendance. If there is no school faculty monitoring the sign in sheets, then the school could be held liable for false certification.

Q. If they just take one test in person? Would that count?

A. If there is one meet up during the term where the student is obligated to come on campus and meet with their professor it can be certified as in residence. So, if the testing is at a formal university site and if it's proctored by university officials, then it's certifiable as in-residence.

Q. Is there a requirement for a hybrid term to end on Friday of last week? Can it end on Sunday if that is an official end term dates noted in school's catalog?

A. The procedural change is to certify hybrid courses as in-residence for terms beginning on or after August 15, 2019. The end date is not a factor in the procedural change. However, schools must adhere to certifying the correct published term dates in their school's catalog/academic calendar.

Q. If the test is taken at a testing center on campus and not necessarily a classroom?

A. If the testing is at a formal university site and if it's proctored by university officials, then it's certifiable as in-residence. If students are meeting randomly at off campus sites to test then it should not be certified as in-residence.

Q. Since hybrid courses are now considered as resident courses for certification purposes, could students use hybrids for their remedial courses?

A. No. Per CFR 21.4267(g) VA does not approve any Remedial/Deficiency courses that are not taught 100% resident in classroom. Since they cannot be approved unless offered as 100% in residence the changes regarding hybrid courses do not apply to Remedial/ Deficiency courses as there should not be any Hybrid remedial/ deficiency courses approved.

Q. How would you certify a class where some students are in the room with the instructor and some are viewing via satellite from a separate location at the same time? Are some resident and some distance?

A. Based on 38 CFR 21.4233(c)(2): Closed circuit telecast. Instruction offered through closed circuit telecast which requires regular classroom attendance is to be recognized to the same extent as regular classroom and/or laboratory instruction. If all students are going on campus to watch training via technology it can be certified as in residence.

Note: If students come to the campus and attend in classroom, SCOs can certify as in residence. Even if its optional and students come to campus to attend, SCOs can certify it as in residence. However, a faculty member must be monitoring the attendance. If there is no school faculty monitoring the sign in sheets, then the school could be held liable for false certification.

Q. Would a course that has students in seats at various campuses with one instructor video conferencing is it distance or resident?

A. Yes, it is certifiable if it's a formal offering by the school and there has to be some method to prove that the student attended the on-campus video training.

Based on 38 CFR 21.4233(c)(2): Closed circuit telecast. Instruction offered through closed circuit telecast which requires regular classroom attendance is to be recognized to the same extent as regular classroom and/or laboratory instruction. If all students are going on campus to watch training via technology it can be certified as in residence.

Note: If students come to the campus and attend in classroom, SCOs can certify as in residence. Even if its optional and students come to campus to attend, SCOs can certify it as in residence. However, a faculty member must be monitoring the attendance. If there is no school faculty monitoring the sign in sheets, then the school could be held liable for false certification.

Q. If the only on campus requirement is to come in to the testing center...not actually a class - is that considered residence?

A. If there is one meet up during the term where the student is obligated to come on campus and meet with their professor it can be certified as in residence. So, if the testing is at a formal university site and if it's proctored by university officials, then it's certifiable as in-residence.

Q. In the past I have tried to adjust units from distance to residence (netting the same total units) but VA Once will not allow the change. I tried using "increase" because res was increased. I'm concerned that "reduction" will somehow create debt for the student.

A. If this occurs, you may not be using the correct internet browser when entering VAONCE. Please ensure you are using Internet Explorer 11.0 or earlier. Although all browsers can access VA-ONCE, other browsers have not been fully tested to certify compatibility. If this does not work, you may contact your ELR.

Q. On the last example regarding voluntary attendance and use of supporting evidence. Does that mean certification will be as online until documentation is obtained and then once evidence is received VA Once is amended for that course to residence?

A. Not necessarily, a best practice would be for SCOs to speak with the student to verify that the student stated that they will attend the classroom session, then certify the course as in residence. SCOs should certify based on the answer of the student. This process will vary for many SCOs depending on when the class attendance occurs in the term. SCOs should do what works for them in order to certify accurately to the best of their knowledge at the time of certification. If it is later discovered after monitoring attendance that the student did not attend, the SCO will adjust the certification.

Q. If there is a mandatory component (meaning it is not optional for the student to attend or not attend, they are just expected to go), but the student misses it, will the student have to then be reverted to distance learning? What if the student using benefits for the first time and wants back to pay and it's after August 2019. Do we not certify them?

A. If the term began on or after August 15, 2019, then the certification can be retroactively adjusted. If it's before August 15, 2019, then it should not be retroactively adjusted.

Q. Can you share any background on how the change came about for hybrid/residence/distant

A. The change in how we pay hybrid courses is due to the requirement of the payment statutes (38 U.S.C. § 3313(c)(1)(B)(iii) and (g)(3)(A)(ii)(I)(bb)) which, essentially, state that "in the case of an individual pursuing a program of education solely through distance learning on more than a half-time basis, a monthly housing stipend equal to 50 percent of the amount payable under clause...". This means that since hybrid courses are not offered solely through distance learning, they should be certified and paid at the in-residence MHA rate.