

Before we begin...

- The webinar will start at **3 pm** (eastern standard time)
- New format for webinar using Adobe Connect
 - One session per quarter
 - Allows us to reach larger audience
- Please make sure to:
 - Mute your phone
 - Turn off any webcams or microphones (if applicable)
- **Audio can ONLY be accessed by calling 1-800-767-1750**
 - **Conference code: 37638**
- Slides will be available in 1-2 weeks on our website under the **School Training Resources** page



VBA Education Service Quarterly Webinar

February 22, 2017

Veterans Benefits Administration

VA



**U.S. Department
of Veterans Affairs**

Agenda

- Director's Welcome
- Public Law 114-315
- 48 Month Rule
- POE & Complaint System
- Outcome Measures
- ACICS Update
- General EDU Reminders
- Question & Answers

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.benefits.va.gov/gibill
- To find the webinars, visit www.benefits.va.gov/gibill
 - Click on “For School Administrators”
 - Select “School Resources”
 - Select “Education Benefit Presentations” under the Certifications and Training header
- For any specific or situational questions you may have, please contact your ELR or call the School Certifying Official Hotline

Director Worley



Welcome

Public Law 114-315



POST ★ 9/11 GI BILL

It's Your Future

Public Law 114-315

- H.R. 6416 Jeff Miller and Richard Blumenthal Veterans Health Care and Benefits Improvement Act
- Background:
 - December 1, 2016: Introduced in U.S. House of Representatives
 - December 6, 2016: Passed House 419-0
 - December 10, 2016: Passed Senate through Voice Vote
 - December 16, 2016: Signed into law by President Obama (P.L. 114-315)

Public Law 114-315 (cont.)

- Sections of Law
 - There are approximately 75 sections for implementation in P.L. 114-315, Education Service has been assigned 15 sections.
 - All sections in the law that relate to Education Service have been studied and are at various stages of implementation.
 - At this time, there are 6 sections that have an “IT Impact” and at least 2 that require funding.

Select Sections of Interest

- Section 404 – Require schools to report progress of students receiving Post-9/11 GI Bill benefits
- Section 405 – Allows VA to make a benefit election for the Veteran with Veteran approval
- Section 406 – Reinstates work-study at SAAs, VA hospitals, national/state cemeteries
- Section 407 – Centralized Reporting of Veteran Enrollment by Certain Groups, Districts, and Consortia of Educational Institutions

Select Sections of Interest (cont.)

- Section 414 – VA must contract for survey to assess effectiveness and nature of beneficiaries use of transition/education programs
- Section 415 – Requires VA to provide information on articulation agreements through counseling and certificate of eligibility letters
- Section 417 - Allows students using transferred Post-9/11 GI Bill benefits from a Servicemember still on active duty to qualify for in-state residency requirements as of 7/2017

Section 417

- Expands which individuals may qualify as a covered individual for the Resident Rate of tuition
 - A covered individual must be charged the resident rate for semesters, courses, or terms beginning after July 1, 2017.

Section 417 - New Category

- Anyone using transferred Post-9/11 G.I. Bill benefits and the transferor is a member of the uniformed service on active duty.

Section 417 - Expanded Category

- Anyone using benefits under the Marine Gunnery Sergeant John David Fry Scholarship.
 - No requirement to enroll within three years of the service member's death.
 - No requirement of a minimum of ninety days on active duty.

Section 417 - Further Information

- Please visit our website to receive updated information on Section 417 and status updates on each state, the District of Columbia, and the territories:

48 Month Rule

September 2013			
M	T	W	T
.	.	.	.
2	3	4	5
9	10	11	12
16	17	18	19
23	24	25	26
30	.	.	.

September 2013			
F	S	S	Notes
.	.	1	
6	7	8	
13	14	15	
20	21	22	
27	28	29	
.	.	.	

48-Month Rule

- The 48-month rule is part of Title 38 United States Code 21.4020 Two or More Programs.
- *Limit on training under two or more programs.* The aggregate period for which any person may receive assistance under two or more of the following laws may not exceed 48 months (or the part-time equivalent).

48-Month Rule (cont.)

- Chapter 31 (Vocational Rehabilitation & Education) may receive additional assistance under Chapter 31, Title 38 U.S.C. if the Department of Veterans Affairs determines that additional months of benefits under Chapter 31 are necessary to accomplish the purpose of the Veteran's rehabilitation program.

48-Month Rule (cont.)

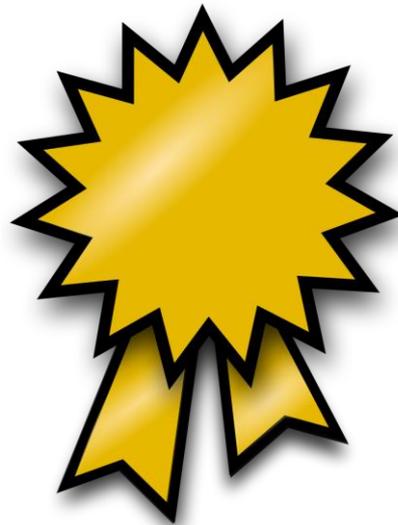
- Chapter 31 (Vocational Rehabilitation & Education) may receive additional assistance under Chapter 31, Title 38 U.S.C. if the Department of Veterans Affairs determines that additional months of benefits under Chapter 31 are necessary to accomplish the purpose of the Veteran's rehabilitation program.

48-Month Rule (cont.)

Example

- An Individual used 20-months of Chapter 1606 (MGIB-SR) and then submits an application for Chapter 33 (Post-9/11 GI Bill). The individual is only eligible for 28-months of benefits, the difference of 48-months.

Principles of Excellence & Complaint System



GI Bill® Feedback System & Complaint Process

VA GI Bill® Feedback System

GI Bill Feedback System
Submit a complaint if your school or employer is failing to follow the Principles of Excellence.
[Visit our feedback system today](#)

[OJT Training Guide](#) [Choosing A School Guide](#) [GI Bill Comparison Tool](#) [GI Bill Feedback System](#)

- <http://www.benefits.va.gov/GIBILL/Feedback.asp>

GI Bill® Feedback System

- January 2014, VA in partnership with DoD, ED, FTC, DoJ , and CFPB launched the GI Bill® Feedback System aka Principles of Excellence Complaint System (PoECS).
- Allows VA, with state and federal agencies, to work with institutions to address issues on behalf of Veterans, Servicemembers, and their dependents utilizing VA educational benefits.
- Allows recipients of VA educational benefits to submit complaints against educational institutions or employers they believe have acted erroneously, deceptively, or misleading practices or failed to follow the PoE.

Complaint Process

- Complaint system is used by VA personnel (VACO, ELR, ECSS's) and SAAs to track and manage cases submitted by individuals, coordinate with educational institutions, and provide feedback throughout the process with the complainant
- Schools should adhere to the “Principles of Excellence” to provide high-quality student support and services to Veterans, Servicemembers, and their eligible family members eligible for or receiving VA education benefits
- VA requests schools:
 - Review the complaint, individual file, and school policies
 - Provide a response to the complaint within 30 days via email to process.vbavaco@va.gov using the following guidelines:
 - reference the case number
 - respond to the complaint
 - use school letterhead
 - response with proposed resolution
- Complaints provide institutions the opportunity to review their policy and procedures for improvement

Complaint Process

Initiate Complaint

- Individuals may submit complaints either for themselves, on behalf of someone else or anonymously against educational institutions they feel has acted erroneous, deceptive, or misleading practices, or failed to adhere to the Principles of Excellence
- Online through GI Bill® website – www.benefits.va.gov/gibill/feedback
- GI Bill National Call Center – 1-888-442-4551

Review Complaint

- Determine if complaint is valid
- Does complaint need to be referred to another agency?
- Is complaint routine or egregious?
- Is complaint from a whistleblower or anonymous source?

Refer Complaint

- Routine - send to school for response
- Egregious - determine appropriate course of action – refer to other federal agencies, VA Office or RPO (ELR/SAA)

Process Complaint

- Manage and monitor
- Response from school forwarded to complainant

Close Case

- Review response and provide to complainant
- Close case
- Complaint issue profile available in GI Bill® Comparison Tool

Complaint Process

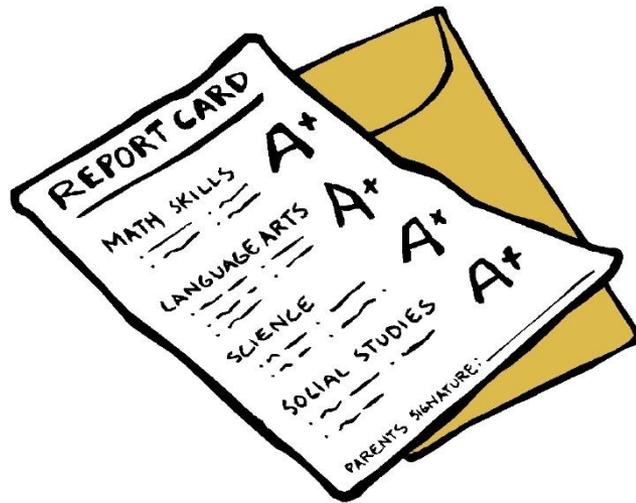
Complaints (as of Feb 12, 2017)

Year	PoE Related	Not PoE	Total
2014	1507	933	2440
2015	1948	813	2761
2016	937	1466	2403
2017	160	63	223
Total	4552	3275	7827

Issue(s) - PoE Related

Financial Issues (e.g. Tuition/Fee charges)	2348
Quality of Education	1230
Other	1210
Recruiting/Marketing Practices	805
Student Loans	797
Refund Issues	692
Accreditation	648
Transfer of Credits	618
Post-graduation Job Opportunities	480
Change in degree plan/requirements	455
Grade Policy	407
Release of Transcripts	339

Outcome Measures



Outcome Measures

Executive Order 13607 (Background)

- VA is required to develop and publish outcome measures, which will support Veterans, Servicemembers, and their family members in making the most informed educational decisions
- VA, Department of Education (DoED), and Department of Defense (DoD) have been working in collaboration over the past 5 years to develop, define, and publish outcome measures that will provide information on available educational programs

Outcome Measures

Measures

Persistence Rate

- Measures full-time and part-time Post-9/11 GI Bill Student Veterans' attendance at any school from the first to the second year.

Retention Rate

- Measures full-time and part-time Post-9/11 GI Bill Student Veterans' attendance at the same institution from the first to second year.

Transfer-Out Rate

- Applies to 2-year IHL schools only, measures full-time and part-time Post-9/11 GI Bill Student Veterans' who transfer within 150% (3 years) and 200% (4 years) of normal program length.

Outcome Measures

Measures

Certificate Completion

- Measures full-time and part-time Post-9/11 GI Bill Student Veterans' certificate of completion at an approved school (which is not an Institution of Higher Learning) that is reported within the VA system while the student is using benefits.

Graduation Rate

- Measures full-time and part-time Post-9/11 GI Bill Student Veterans' graduation or certificate completing at an Institution of Higher Learning that is reported within the VA system while student is using benefits.

Outcome Measures

4-Year Graduation Rate Update

- The graduation data was originally based on first-time Post-9/11 GI Bill Servicemembers/Veterans who have **not** used prior Education benefits. Enrollments at flight/correspondence facilities were not included.
- The graduation data has been updated to reflect all Veterans/Servicemembers who have used the Post-9/11 GI Bill benefit. This includes all Veterans/Servicemembers who may have used prior Education benefits. i.e. Chapter 30, 1606, 1607. Enrollments at flight/correspondence facilities were not included.

Outcome Measures

Time Line

- August 10, 2016 – VA sent out 4-year IHL preview data to schools
- September 29, 2016 – VA sends out letter postponing the reporting of 4-year IHL data
- December 01, 2016 – Graduation data is revised to include all users of Post9/11 GI Bill
- January 12, 2017 – Data refreshed to show updated 2-year IHL rates, as well as 4-year IHL graduation rates
- February 15, 2017- May 31, 2017 – Data validation
- September 2017 – Publication to the Comparison Tool

Questions?

What if schools have questions regarding the data?

School officials should send their questions to:

outcomemeasures.vbavaco@va.gov

ACICS Update



ACICS

What is ACICS

- It is an accrediting agency – the Accrediting Council on Independent Colleges and Schools
- It is the oldest and largest National Accrediting Organization of Degree Granting Institutions in the United States'
- 245 ACICS schools (over 700 campuses) were approved for GI Bill benefits
- ACICS is no longer recognized; derecognized in December 2016

The Role of Veterans Affairs

- To provide VA beneficiaries timely and accurate claims processing
- To provide useful information on GI Bill benefits and advise on educational pursuits to create the best informed consumer.
- To protect the integrity of GI Bill benefits by exercising authorities to address fraudulent and deceptive activities by schools

Program Participation Agreement (PPA)

What is PPA

- PPA is a signed provisional Program Participation Agreement for institutions
- After ACICs was derecognized, new PPAs had to be implemented by affected schools
- The Department of Education has received 236/237 signed PPA's from participating institutions
- Under the PPA, institutions are closely monitored for the next 18 months by the Department of Education as they pursue alternative accreditation
- Based on legislation passed in September 2016, VA also has an 18 month grace period to continue paying benefits

Program Participation Agreement (PPA)

- The Department of Veterans Affairs works in partnership with the Department of Education to monitor the progress toward accreditation of each school under the PPA
- The Department of Education will routinely notify the Department of Veterans Affairs concerning any changes in the institutions covered under the PPA's

General Reminders

POST ★ 9/11
GI BILL

It's Your Future

General Reminders

- Enrollment Certs can be submitted to VA up 120 days before the 1st day of class
- Holiday breaks between Fall and Spring semester; no break pay, no MHA payment
- We encourage open and honest communication with your GI Bill beneficiaries

Resources

- Revised School Certifying Official Handbook was recently updated and published on the website (mid-February 2017)
 - Further revisions are in progress ongoing
- School Certifying Official Hotline
 - Direct line of communication with VA for inquiries on student issues
 - For tuition payment issues where you are waiting for VA to release the funds, please contact us using the SCO Hotline rather than the student
 - Education Case Managers who have the expertise to answer and resolve most SCO questions work between 7:00am to 5:00pm (CST) Monday through Friday
 - **Contact your ELR for the number**
- School Training Resources on GI Bill Website
 - Includes VA ONCE training, online training, handbook, links to webinars, etc.
 - http://www.benefits.va.gov/gibill/school_training_resources.asp

Questions & Answers



Questions and Answers – Covered Individuals

Question #1: Regarding Public Law 114-315, can you clarify who falls into eligibility. The letter from our state says "public institutions of higher education must charge qualifying Veterans, dependents and other eligible individual's tuition and fees at the rate for in state residents "During the webinar, it was indicated that this applies to transferred Post 9/11 GI Bill benefits. Is this all that meets qualification or is Post 9/11 benefit recipients?

Answer #1: The bullets below list the individuals who are covered individuals under 38 U.S.C. 3679(c).

- A Veteran using educational assistance under either chapter 30 (Montgomery G.I. Bill – Active Duty Program) or chapter 33 (Post-9/11 G.I. Bill), of title 38, United States Code, who lives in the state in which the institution is located (regardless of his/her formal State of residence) and enrolls in the institution within three years of discharge or release from a period of active duty service of 90 days or more.

Questions and Answers – Covered Individuals

- Anyone using transferred Post-9/11 GI Bill benefits (38 U.S.C. § 3319) who lives in the state in which the institution is located (regardless of his/her formal State of residence) and enrolls in the institution within three years of the transferor's discharge or release from a period of active duty service of 90 days or more.
- Anyone described above while he or she remains continuously enrolled (other than during regularly scheduled breaks between courses, semesters, or terms) at the same institution. The person so described must have enrolled in the institution prior to the expiration of the three year period following discharge or release as described above and must be using educational benefits under either chapter 30 or chapter 33, of title 38, United States Code.
- Anyone using benefits under the Marine Gunnery Sergeant John David Fry Scholarship (38 U.S.C. § 3311(b)(9)) who lives in the state in which the institution is located (regardless of his/her formal State of residence).

Questions and Answers – Covered Individuals

- Anyone using transferred Post-9/11 G.I. Bill benefits (38 U.S.C. § 3319) who lives in the state in which the institution is located (regardless of his/her formal state of residence) and the transferor is a member of the uniformed service who is serving on active duty.

Question #2: For the new definition of covered individuals, does this apply to current students?

Answer #2: The new definition of covered individuals applies for semester, terms, or courses that begin after July 1, 2017. Schools will need to make a determination on all enrollments after July 1, 2017 if students qualify for covered individual status.

Questions and Answers – VA-Once

Question #3: What is the process for entering the grad data in VA-Once?

Answer #3: The school highlight the term during which the graduation occurred, select terminate, and select graduation from the list of reasons for termination.

Question #4: Are there any updates on VA-Once being replaced by VA-Cert?

Answer #4: Currently, there are no updates.

Question #5: Are there any updates coming in VA ONCE?

Answer #5: Yes, we are constantly working on updates and improvements. The next update is to add VA Form 22-6553d, Monthly Verification for OJT/Apprenticeship Programs.

Questions and Answers – VA-Once

Question #6: Will VA-Once ever have the information that shows how many months of eligibility a person has like we were told a few years ago?

Answer #6: This is a long-term goal that we are trying to achieve.

Question #7: So, if a student exhausts their entitlement 2 days before graduation date, by terminating the certification, should we use reason for term as end of term or graduating?

Answer #7: If this is an NCD program the reason End of Term or Course should be used. If it is an IHL, then Graduation should be used. The date the student exhausts their entitlement has no bearing on the reason for termination.

Question #8: Can you certify after day 1?

Answer #8: Yes

Questions and Answers – VA-Once

Question #9: For Academic Progress are we supposed to indicate this for everyone even if they are making satisfactory progress, or are we only to report probation and/or suspension? For Graduation where are we supposed to report this since we are discouraged from putting comments in the Remarks section? Wouldn't it be easy to have a check box in VAONCE for these issues just like there is for Active Duty and Guest Student?

Answer #9: There is no current policy on academic progress. We do not currently report this in VA-ONCE. Graduations should be reported as stated in the previous slide, as a termination for the reason "Graduation". If this is in regards to the new law, it has not yet been determined HOW the schools will report academic progress. If changes need to be made to VA-ONCE then we will make them.

Questions and Answers – 48 months

Question #10: To clarify, if they switch without exhausting the first benefit, the change allows them to have the difference in the 48 months to use the second benefit?

Answer #10: An individual must exhaust benefits under one program and then may use the same period of service (as long as that period was prior to August 1, 2011) to receive the remaining 12 months of benefits (up to 48 months). Otherwise, that individual would get the remainder of the relinquished benefit.

Example: An individual uses 20 months of Chapter 30 (MGIB) and then elects to use Chapter 33 (Post-9/11), they would receive 16 months (the remainder of 36 months; 36 months minus 20 months used under Chapter 30 equals 16-months of Chapter 33). However, if the individual were to instead exhaust the 36 months under Chapter 30 (MGIB) prior to converting (and their period of service was prior to August 1, 2011) the individual would instead get an additional 12 months of Chapter 33 (a total of 48 months).

Questions and Answers – 48 months

This, however, is not the case for a period of service beginning after August 1, 2011. For those periods, an individual must select which benefit they wish to apply that period of service and cannot convert it to a different program later

Question #11: Regarding the 48 month rule, previously, if someone did not exhaust their 36 month prior to electing to transfer to C33, they'll now still get a total of 48 months rather than the balance they had remaining of their 36 months at the time of transfer?

Answer #11: No. An individual must exhaust their entitlement under one benefit program to receive up to 12 months of entitlement for an additional education benefit program. For an individual with service prior to August 1, 2011, they are allowed to use a single period of service to use up to 36 months of one education program and then receive up to 12 months under an additional education benefit program. On the other hand, for an individual with service on or after August 1, 2011, they are only allowed to use a single period of service to use up to 36 months of one education program. They are not allowed to convert that period of service to a different benefit and, therefore, cannot use that same period to then receive up to 12 months under an additional education benefit program.

Questions and Answers – 48 months

Question #12: What is section 417? I'm new and haven't a clue 47.
More than 48?

Answer #12: “Section 417” refers to section 417 of Public Law 114-315. It concerns requirements regarding to in-state residency rates for tuition and fees. It has nothing to do with the 48-month rule.

Questions and Answers – 48 months

Question #13: In the past if we switched from Chapter 30 to 33 before the 36 months were exhausted they only received the remaining entitlement in Chapter 33 has that changed?

Answer #13: No. However, an individual with service on or after August 1, 2011, must elect which benefit they want their service period to apply. They cannot later convert this period to a different benefit program.

Example: A Veteran of the Navy served from August 1, 2012, to July 31, 2016. He/She applies for education benefits and opts to use Chapter 30 (MGIB). The individual will use their single period of service on Chapter 30. The individual may not exhaust their 36 months of entitlement and receive an additional 12 months (48 months total) based on a single period of service.

If that same Veteran had a period of service from August 1, 2006 to July 31, 2010, and he/she followed the above scenario, he/she may receive up to an additional 12 months of benefits (Post-9/11 GI Bill) based on that single period of service. If the individual switched from Chapter 30 to Chapter 33, the Veteran would only receive the remaining benefits (prior to exhausting 36 months). The rule is still in place, but it depends on the period of service before or on or after August 1, 2011.

Questions and Answers – Outcome Measures

Question #14: None of the persistence/retention measures indicate outcomes at 4-year IHL's whose veterans are transfer students in their 3rd/4th years (attended a 2-year school for 1st/2nd years)?

Answer #14: Persistence/retention rates apply to 2-year and 4-year IHL schools. Transfer-out rates apply to 2-year schools only.

Question #15: Do you track graduation rates from graduate or doctorate degrees? Or are rates only based on undergraduate degrees?

Answer #15: No. Graduation rates from graduate/doctorate degrees are not included in this data set. Graduation rates are only based on undergraduate degrees.

Questions and Answers – Outcome Measures

Question #16: Last year the graduation rate report was not correct for many schools. was it fixed?

Answer #16: The graduation was updated to include Veterans/ Servicemembers who have used the Post-9/11 GI Bill benefit (CH33). This includes all Veterans/ Servicemembers who may have used prior education benefits. i.e. Chapter 30, 1606, 1607. Enrollments at flight/correspondence facilities were not included. Therefore, the graduation rates have changed.

Question #17: We are missing some graduation rate #'s if the veteran happens to not be using their benefits or exhausted benefits the last quarter of graduation.

Answer #17: Schools should only report information on students who are receiving education benefits. If a student exhausts their benefits, the school should not report any further information.

Questions and Answers – Outcome Measures

Question #18: Graduation rates are inaccurate if veteran doesn't use benefits in final term. Not reportable on VA-Once.

Answer #18: Graduation rates reflect Veterans/Servicemembers who graduate while using the Post-9/11 GI Bill.

Question #19 . Graduation rates still only include veterans who graduate while using benefits in their final term, correct? Excludes veterans who ran out of benefits prior to graduation.

Answer #19: Correct. Graduation rates reflect Veterans and Servicemembers who graduate while using the Post-9/11 GI Bill.

Questions and Answers – Outcome Measures

Question #20: Are students using transferred Chapter 33 benefits included in comparison data or will they be included in the future?

Answer #20: Veterans and Servicemembers are the only beneficiaries published on the Comparison Tool at this time. Other beneficiaries may be included in the future.

Question #21: Has there been any change in that a student needs to be using their benefits at the time of graduation to be counted in the graduation rate?

Answer #21: No, there has not been a change. Veterans and Servicemembers must still be using CH33 at the time of graduation to be included in the data set.

Question #22: Does the veteran have to graduate under Chapter 33 to be counted in the outcome measures ?

Answer #22: Yes. Veterans and Servicemembers must be using CH33 at the time of graduation to be included in the data set.

Questions and Answers – Outcome Measures

Question #23: Who do I need to contact to learn more about the outcome measures and how the VA collects and uses the data?

Answer #23: Please forward questions regarding the outcome measures to Outcome.Measures@va.gov

Question #24: Why are students who exhaust benefit and graduate not included in VA Outcomes?

Answer #24: Due to system limitations, VA is unable to track students after education benefits have exhausted

Question #25: If we are unable to report graduation for Post 9/11 students who have exhausted their benefits wouldn't that decrease our graduations rates? If yes, how does that affect our schools status?

Answer #25: This may be a possibility. However, the graduation measure is tracking students who have graduated with a bachelor's degree while using the Post 9/11 GI Bill.

Questions and Answers – Outcome Measures

Question #26: The question about graduation after a vets benefits expire, that's a skewed result because if I certify a vet for 3 years and their benefits expire a month before they graduate, it seems unfair not to count that student in some way. Are they looking into a way to count those people?

Answer #26: The graduation measure tracks Veterans and Servicemembers who have graduated with a bachelor's degree while using the Post 9/11 GI Bill. Exploration into capturing Veterans/Servicemembers who have exhausted their benefits is ongoing.

Questions and Answers – Outcome Measures

Question #27: If you are only counting Chapter 33 graduates, why is that not noted on the Comparison Tool?

Answer #27: All information concerning the data on the Comparison Tool is located on the “About this Tool” link at the bottom of the Comparison Tool website. The first topic “Subjects” explains how the data is compiled for Outcome Measures

Question #28: NCD Clock Hour Schools may only show Certificate of Completion if the student completes the scheduled hours on or before the certified end of term date. Most students do not have perfect attendance and do not complete the scheduled hours by the end of term date. Therefore, our outcome measures will never look good, even those these Chapter 33 students do complete the scheduled hours a week or two after the end of term date. Is there anyway to show that these students did receive a cert of completion?

Answer #28: When the first Certificate of Completion or Graduation is entered in VA-Once, the school that submitted it receives credit.

Questions and Answers – Outcome Measures

Question #29: If the student graduates from community college then transfers and gets a BS from a 4-year school is only counted for the 4-year school, that will severely under-report the graduation rate at community college?

Answer #29: The community college will receive the graduation credit if the student graduates with an associate's degree prior to transferring to the 4-year school. However, if the student does not obtain a degree prior to transferring to the 4-year school; the student will be counted in the "Transfer-Out" rate (This rate only exists for 2-year schools). The school that the student receives his first degree from will receive the graduation credit.

Contact Us

Website: www.benefits.va.gov/gibill

Facebook: www.facebook.com/gibilleducation

