

Before we begin...

- The webinar will start at **10 am** (eastern daylight time)
- 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: 51636
- Slides are attached to this meeting; upper right-hand side of the box look for a paperclip – click it to download the PowerPoint
 - The final version will be available in 1-2 weeks on our website under the **School Training Resources** page





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VBA Quarterly Education Service Webinar

September 16, 2015

Agenda

- UPDATE: Section 702 (Choice Act) – The Resident Rate Requirements
- Outcome Measures – Demo
- Communication/Best Practices with Beneficiaries
- Accelerated Learning Programs (ALPs)
- ICYMI (In Case You Missed It)
- Vocational Rehabilitation & Employment (VR&E)
- Questions & 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



Section 702 (Choice Act) – Resident Rate Requirements



Section 702 – In-State Tuition Provision Overview

- Section 702 of the Choice Act requires that VA disapprove programs of education for payments of benefits under the Post-9/11 GI Bill and Montgomery GI Bill Active Duty at a public IHL if the school charges qualifying individuals tuition and fees in excess of the rate for resident students
- To remain approved for Post-9/11 and MGIB benefits, schools must charge in-state tuition and fee amounts to “covered individuals” under those two programs

Section 702 – “Covered Individuals”

- A “covered individual” is defined in the Choice Act as:
 - A **Veteran** who lives in the state where the IHL is located (regardless of formal state of residence) and enrolls in the school **within three years of discharge** from a period of active duty service of 90 days or more
 - An individual using transferred benefits who lives in the state where the IHL is located (regardless of his/her formal state of residence) and enrolls in the school **within three years of the transferor’s discharge** from a period of active duty service of 90 days or more
 - An individual using benefits under the **Fry Scholarship** who lives in the state where the IHL is located (regardless of his/her formal state of residence) and enrolls in the school **within three years of the Servicemember’s death** in the line of duty following a period of active duty service of 90 days or more

Section 702 – Compliance Update

- Currently all states and territories comply w/ the exception of:
 - American Samoa
 - District of Columbia
 - Louisiana
 - Northern Mariana Islands
 - Arkansas (decision at school level)
 - Delaware (decision at school level)
 - Idaho (decision at school level)
 - Iowa (decision at school level)
- VA will continue to work with these states/territories to ensure they comply prior to January 1, 2016 when the waiver expires.

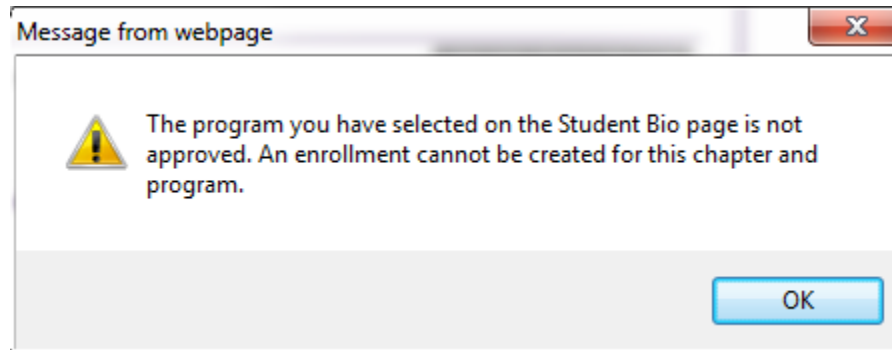
Section 702 – Reporting to VA

- The Standard Programs page in VA ONCE will have an additional column for 702 compliance. If the program complies, there will be a check mark in this field
- **This will be read-only for School Certifying Officials.** The ELRs will be able to check or uncheck each program

<input type="checkbox"/>	Abbreviation	Program	Objective Code	Course Code	Facility Code	Deact	Order #	702 Compliant
<input type="checkbox"/>	AA/LIBA	Associate of Arts Liberal Arts	022	172	31903114		1	✓
<input type="checkbox"/>	AS/AIS	Associate in Science Computer Information Systems	012	915	31903114		2	✓
<input type="checkbox"/>	AS/ALIS	Associate in Science Life Sciences	012	915	31903114		3	✓
<input type="checkbox"/>	AS/AMAD	Associate in Science Management and Administration	012	060	31903114		4	✓
<input type="checkbox"/>	AS/ANU	Associate in Science in Nursing	012	133	31903114		5	✓
<input type="checkbox"/>	AS/CHEM	Associate in Science Chemistry	012	162	31903114		6	✓
<input type="checkbox"/>	AS/PTA	Associate in Science Physical Therapy Assistant	012	139	31903114		7	✓
<input type="checkbox"/>	BA/AACT	Bachelor of Arts Accounting	021	060	31903114		8	✓
<input type="checkbox"/>	BA/ACPA	Bachelor of Arts Accounting/CPA track	021	060	31903114		9	✓
<input type="checkbox"/>	BA/ANTH	Bachelor of Arts ANTH	021	179	31903114		10	✓
<input type="checkbox"/>	BA/ART	Bachelor of Arts ART	021	091	31903114		11	✓
<input type="checkbox"/>	BA/BIOL	Bachelor of Arts Biology	021	120	31903114		12	✓
<input type="checkbox"/>	BA/BIOM	Bachelor of Arts Molecular Biology	021	120	31903114		13	✓

Section 702 – Reporting to VA

- If the program is not approved (not section 702 compliant), the school will not be able to create a new Enrollment Certification. You will see this message:



- The process of updating VA ONCE is ongoing; we will let you know through your ELR as changes occur

Section 702 – Transparency

- We encourage schools to help students understand Section 702 and how it impacts them
- Explaining eligibility decisions to students will help avoid confusion and eliminate unwanted attention on your school

Alex Hello, I am currently attending (NAME REMOVED) as an out-of-state student using my transferred Ch. 33 Post-9/11 GI Bill & Yellow Ribbon scholarship. To my understanding, this year I would qualify for in-state tuition (as a result of Section 702 of the Choice Act) because I was using my benefits within a 3 year window of my father's discharge (discharged in Feb. 2012 and I enrolled and began using my benefits in Fall 2013) and living in off-campus housing in the same state as my IHL. According to the Choice Act waiver form provided by my school, I was to provide a copy of my transferor's DD214, Transfer of Entitlement, and a proof of abode in NC (for example, a copy of lease or utility bill). I provided all three documents. However, after explaining my situation and several emails later, the Campus Appeals Committee determined that I will still remain classified as an out-of-state student and offered no explanation or reason as to exactly why.

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Section 702 – Resources

- Website
 - www.benefits.va.gov/gibill/702.asp
- Press Release
 - <http://www.va.gov/opa/pressrel/pressrelease.cfm?id=2700>
- FAQs (search for “702”)
 - <https://gibill.custhelp.com/app/answers/list>
- Facebook
 - www.facebook.com/gibilleducation
- Comparison Tool
 - www.benefits.va.gov/gibill/comparison/

GI Bill Outcome Measures



GI Bill Outcome Measures

- VA is collecting the following outcome measures:
 - Retention Rate
 - Persistence Rate
 - Transfer Rate
 - Graduation Rate
 - Certificate Completion Rate

GI Bill Outcome Measures (cont.)

- VA does not have the statutory authority to require reporting
 - We ***strongly encourage participation*** to ensure that the most accurate and complete information is available to our Veterans
- School Certifying Officials should report program completion/graduation information data through the VA-ONCE system
 - Further information can be found in the SCO handbook, VA-ONCE user guide, or by contacting your Education Liaison Representative
- Outcome Measures will be posted to the GI Bill website
- Demonstration of interim staging site by Mr. Jude Lopez ([Link](#))

Communication/Best Practices with Beneficiaries



Best Practices With Beneficiaries

- Transparency with GI Bill users is crucial
- 2015 Fall Semester enrollments certification processing is taking longer than normal compared to this time last year
 - Many GI Bill users have found their way to the GI Bill Facebook page to vocalize frustration or issues they are having with their claim
 - That also expands to their experience with schools
- News of bad customer service reaches more than **twice as many** ears as praise for a good service experience
 - Source: White House Office of Consumer Affairs; <http://www.bbb.org/phoenix/news-events/business-tips/2014/09/negative-reviews-a-golden-opportunity-for-business/>

Best Practices with Beneficiaries (cont.)

- Common themes include:
 - Delayed submission of enrollment to VA
 - Requiring a new or updated Certificate of Eligibility before submitting enrollment
 - [Angela](#) I was told I can no longer obtain a COE online due to problems with eBenefits. The processing time for my claim/benefits will take longer than the time I have to complete Fall 2015 registration. I will be using my Post 9/11 GI Bill benefits. If I pay for my Fall classes now, will I be reimbursed when my claim is processed?
 - [Angela](#) Yes the school is refusing to submit my enrollment until they have my COE.
 - Inability to reach school certifying official
- To help mediate this we encourage open and honest communication with your GI Bill beneficiaries
 - Provide them with information/resources as appropriate

Best Practices with Beneficiaries (cont.)

- Resources for students include:
 - GI Bill Hotline (1-888-442-4551)
 - Automated option 3 provides a payment status
 - GI Bill Facebook (www.facebook.com/gibilleducation)
 - “Ask a Question” Feature (<https://gibill.custhelp.com/app/ask/>)
 - Crisis Hotline (1-800-273-8255 press 1)
 - Veterans who are homeless or at-risk (1-877-4AID-VET)
 - Free Application for Federal Student Aid (<https://fafsa.ed.gov/>)
- Together we can help manage the volume and reduce negative experiences



Accelerated Learning Programs (ALPs)



Accelerated Learning Programs (ALPs)

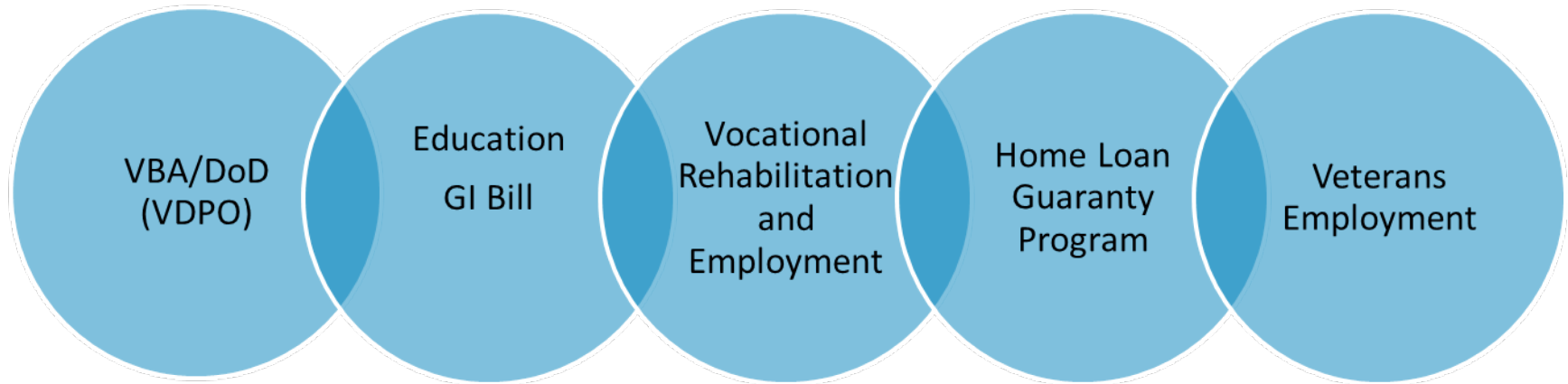
- Transitioning Servicemembers and Veterans may be eligible to participate in an ALP in Information Technology at no-cost
 - ALPs are NOT a GI Bill benefit – it DOES NOT use GI Bill entitlement
 - Students may participate in an ALP while utilizing their GI Bill benefits for another program of study
- The ALPs are designed to help beneficiaries gain skills and certifications necessary for employment in the IT workforce
- Visit VA's ALP website to learn more: benefits.va.gov/tap/alp.asp

Vocational Rehabilitation & Employment (VR&E)



Office of Economic Opportunity

“Helping Veterans Attain Personal and Economic Success”



Strategic Goal #1: Promote employment opportunities for Veterans

Strategic Goal #2: Enhance opportunities for Veterans to obtain knowledge and skills

Strategic Goal #3: Provide opportunities for Veterans to obtain, retain and adapt a home

Strategic Goal #4: Enable effective transition for Servicemembers

VR&E Mission

The mission of Vocational Rehabilitation and Employment (VR&E) is to help Veterans with service-connected disabilities and an employment handicap prepare for, find, and maintain suitable careers

For Veterans with service-connected disabilities so severe that they cannot immediately consider work, VR&E provides services to improve their ability to live as independently as possible

VR&E Key Services Provided

- VR&E employs nearly 1,000 vocational rehabilitation counselors and delivers services through a network of nearly 400 office locations
- Support Veterans where they are located, including operations at 56 regional offices, the National Capital Region Benefits Office, approximately 165 out-based offices, 71 Integrated Disability Evaluation System (IDES) installations, and 94 VetSuccess on Campus (VSOC) schools/sites
- VSOC
 - We have collaborated with 94 schools across the country to provide educational and vocational counseling and other on-site services to nearly 78,000 student Veterans on campus
- IDES
 - We have expanded early intervention counseling and other available services for transitioning Servicemembers at 71 military installations



VR&E Key Services Provided (cont.)

- Help Veterans with service-related disabilities:
 - Achieve and maintain suitable employment
 - Gain independence in daily living
- Vocational counseling and planning
- Education or vocational training
- Monthly living allowance in addition to disability compensation
- Tools to accommodate program (e.g. auto mechanic tools, computers for technology/professional fields)
- Job-seeking skills and assistance in finding employment
- Independent living:
 - Training in activities of daily living
 - Personal adjustment counseling and support services



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VR&E Payments & Invoicing

To ensure consistency across VR&E Offices regarding invoicing requirements and payment of taxes, guidance has been disseminated to our Finance divisions and VR&E field offices.

VA must adhere to the Prompt Payment Rule (5 CFR 1315.4 (b)) that ensures Federal agencies pay vendors in a timely manner.

Invoices at a minimum must include:

- Name of vendor, invoice date, invoice number, Vendor point of contact (name, title, and telephone number), Veteran's name with clearly delineated costs per Veteran, description of service (tuition, fees, supplies, etc.), date or time period services/goods were provided to Veteran.



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VR&E Payments & Invoicing (cont.)

Recommendations :

- Communication
 - Request and maintain an updated regional office staffing list of Vocational Rehabilitation Counselors or designated POC
 - 28-1905, Authorization for Services
 - Ensure 28-1905 has VRC name and contact information
- Invoicing
 - Comparison discussion on next two slides of business process differences



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VR&E Payments & Invoicing (cont.)

School Payments Comparison	
Chapter 31 - VR&E Benefits	Chapter 33 - Education Benefits
Schools have mandatory use of VA-ONCE effective January 1, 2014 (except for on-the-job training, apprenticeship training, and correspondence training)	Schools have mandatory use of VA-ONCE effective January 1, 2014 (except for on-the-job training, apprenticeship training, and correspondence training)
VA-ONCE provides enrollment information, to include changes to enrollment, and allows VA counselors to authorize monthly subsistence allowance payments.	VA-ONCE provides enrollment information, to include changes to enrollment, and billing/invoice information.
<p>Prior to VA-ONCE certification being provided by a school certifying official (same information appears in CWINRS), VA Form 28-1905 (training authorization) must be sent to the school.</p> <p>Payments are not provided through VA-ONCE.</p> <p>VA counselors are responsible for verifying correct course selection and whether a Veteran is on academic probation.</p>	<p>Based on VA-ONCE certification, payments are made to the Veteran and school; however, the payments are not provided through VA-ONCE.</p> <p>Regional processing offices (RPOs) receive a list of students on academic probation from school certifying officials.</p>
<p>Payments are issued to schools within 30 days of the school providing the original invoice to the VA counselor.</p> <p>Currently, electronic billing is not available, but it is under development with the new case management system.</p> <p>VA counselors validate the invoice and authorize payment to the Finance Voucher Processor (standard: 7 days to Finance Voucher Processor, 30 days total for payment)</p>	<p>Payment information for schools is set up in the Long Term Solution (LTS) through rules-based processing.</p> <p>LTS allows for batch processing of beneficiary payments. The time it takes to receive payment will depend on the type of claim being reviewed (original or supplemental) and the level of automation. Tuition and fee payments can be released up to 14 days before the beginning of a term.</p>



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VR&E Payments & Invoicing (cont.)

School Payments Comparison (Cont.)	
Chapter 31 - VR&E Benefits	Chapter 33 - Education Benefits
Payment is processed through Benefits Delivery Network (BDN) and issued by the Treasury Department to the school.	Payment is processed through BDN and issued by the Treasury Department to the school.
Chapter 31 pays 100% of required tuition, books, fees and supplies for approved VA program (in addition to a subsistence allowance).	Chapter 33 can pay up to 100% of the net costs for in-state tuition and fees at public institutions of higher learning; and up to a statutory maximum amount of net tuition and fee costs per year for enrollment in a private, foreign, or non-degree granting school. The program can also pay a monthly housing allowance for institutional training pursued by Veterans at more than half-time, and also provides a flat rate (up to \$1,000 per year) for books and supplies. All payments are pro-rated for individuals eligible for benefits at less than the 100% level based on the aggregate amount of active duty service accrued.
VA counselors are required to authorize payment.	RPO employees and LTS authorizes payment, depending on the type of claim being processed.
Chapter 31 process is based on receipt of a bill. Counselors must first authorize the full cost of training, and then validate the Veteran's curriculum upon receipt of the bill.	Chapter 33 payment limits are based on benefit level (based on active duty service), and an annual tuition and fee cap if not attending a public degree-granting school.



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In Case You Missed It...



School Certifying Official Resources

- Revised School Certifying Official Handbook to be published in September
- 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



ELR Conference – St. Louis

- Education Liaison Representative Conference is scheduled for September 22nd through September 24th
- ELRs will not be accessible during this time
- Any urgent questions can be directed to the SCO Hotline



Recent/New Advisories

- Tuition Assistance Top-Up under Chapter 30
 - SCOs will use VA Form 22-1999 to certify those classes for students on active duty using the following additional procedures:
 - Only include those classes for which Federal TA is paying for some, but not all, of the tuition and fee charges
 - Only report the remaining “out-of-pocket” charges for tuition and fees, or a lesser amount if desired by the Servicemember
 - Enter “Top-Up” into the Remarks field
- IHL Degree Programs Involving Training Provided and Charged on an Hourly Basis
 - Conference call on September 17th
 - Contact your ELR for more information
 - Focus is on Flight Training
 - See [December 2014](#) Quarterly Webinar

Frequent Questions – Punitive/Non-Punitive

- Punitive Grade
 - A grade that doesn't count as earned credit, but is used in determining a student's progress toward graduation requirements. An example of a punitive grade is "F". Punitive grades factor into the progress standards (for example, GPA or earned/attempted credit standard).
- Non-Punitive Grade
 - A grade that doesn't count as earned credit and isn't considered in progress standards for graduation. A withdrawal after the drop period is non-punitive if it isn't calculated into the student's GPA or it isn't considered in academic progress criteria like probation and suspension. Non-punitive grades have the same effect as an audit. If a student withdraws after the drop period or completes the term with non-punitive grades, the non-punitive grades must be reported to VA if they change training time



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Frequent Questions – Unsatisfactory Progress

- The law requires that educational assistance benefits be discontinued when the student ceases to make satisfactory progress toward completion of his or her training objective
- Both accredited and non-accredited schools are required by law to have and to enforce standards of progress and conduct in order for their programs to be approved for VA benefits
- These standards should be stated plainly in the school's catalog or bulletin

Frequent Questions – Unsatisfactory Progress

- A school's policy and regulations for standards of progress, conduct and attendance must define:
 - The school's grading system
 - The minimum satisfactory grade level
 - Conditions for interruption of training due to unsatisfactory grades or progress
 - A description of any probationary period
 - Conditions for a student's reentrance/ readmission following dismissal/suspension for unsatisfactory progress
 - Conditions for dismissal due to unsatisfactory conduct
 - The school's attendance policy
- More information can be found in the School Certifying Official Handbook

Frequent Questions – Repeating Courses

- Courses that are successfully completed may not be certified for VA purposes if they are repeated
- If a student fails a class, or if a program requires a higher grade than the one achieved in a particular class for successful completion, that course class may be repeated and certified to VA again
- An update to this policy has been made in the new SCO handbook. Examples of this policy are as follows

Frequent Questions – Repeating Courses (cont)

- Examples:
 - Example 1, if a program requires a “B” or better in a class, then that class may be repeated if a “B” or better was not earned. Must be a documented requirement in the school catalog.
 - Example 2. If a course is required for graduation, a student may repeat the course and be certified for it until it is successfully completed. No further information needs to be provided to VA regarding those courses.
 - Example 3. If a student chooses to repeat a course that was successfully completed, just to improve their GPA, that course cannot be certified to VA.
- Details are available in the SCO Handbook

Frequent Questions – Academic Probation

- Schools that have an academic progress policy allowing for a period of academic probation prior to termination for Unsatisfactory Progress (Academic Suspension) should notify VA promptly when a student receiving VA education benefits is placed on academic probation
- Notifications should be sent using VA’s “Ask a Question”
 - Be sure to include the student name and file number
 - Title the inquiry “Academic Probation”
- If multiple students have been placed on academic probation, a single notification may be submitted including **all** of the students that were placed on academic probation

Frequent Questions – Academic Probation

- A spreadsheet, like the example below, should be included with the notification

School Official Completes							
Benefit Chapter	SSN/File Number	Payee	Last Name	First Name	Facility Code	Start Date Academic Probation	Zip Code Current Address



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Comparison Tool Update

- Added new caution flag to schools
 - A caution flag means VA or other federal agencies like the Department of Education or Department of Defense have applied increased regulatory or legal scrutiny to a program of education
 - Featured schools on ED's Heightened Cash Monitoring 1 & 2 List

School Summary

[Source](#)

Number of Complaints:	43 See Details
Caution Flag(s):	Heightened Cash Monitoring (Audit Late/Missing)
Accredited:	Yes See Accreditors »
Post-9/11 Tuition/Fees Paid (FY'14):	\$1,398,580 (103 students)
Post-9/11 Yellow Ribbon Paid (FY'14):	\$96,953 (48 students)



Comparison Tool Update (cont.)

- Updated Tuition and Fees & Yellow Ribbon amounts for 2015-2016 academic year
- More to come including:
 - Additional caution flag categories
 - Outcome Measures



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Questions & Answers



Questions & Answers

- Question: I'd like some more information on how study abroad programs affect VA benefits.
 - Answer: Students must be enrolled in courses that will apply to their program. The programs at the “host” school in the foreign country must be approved. VA cannot pay any fees specific to studying abroad unless the student is required to study abroad as part of their program. For more information check out:
http://benefits.va.gov/BENEFITS/factsheets/education/Post-911_Study_Abroad.pdf
- Question: If a student veteran completes a term full-time, however punitive grades were assigned for one or more courses, should this be reported? If yes, how should it be reported? For example, student registered for 12 credits. Student receives A, A, D-, and F. Do the D- and F need to be reported? If yes, under what circumstances?
 - Answer: If a student received punitive grades, nothing further needs to be reported to VA. However, the SCO is responsible for insuring that any attendance standards are being met and that standards of progress are being enforced.

Questions & Answers

- Question: Please provide clear guidance/interpretation on SCO responsibility with regards to transcripts.
 - Answer: Schools should make every effort to obtain transcripts to comply with the requirement to evaluate and grant credit where appropriate. However, if a transcript cannot be obtained, you may continue to certify enrollment as long as the student has matriculated. Reviews of prior credit policies will be conducted during compliance surveys and treated as approval issues if the school is not complying.
- Question: Please provide a review/definition on continuous enrollment
 - Answer: The term continuously enrolled means being in an enrolled status at an educational institution for each day during the school year, and for consecutive school years. Continuity of enrollment is not broken by holiday vacations; vacation periods; periods during the school year between terms, quarters, or semesters; or by nonenrollment during periods of enrollment outside the school year (e.g., summer sessions).



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Questions & Answers

- Question: We are a clock hour school. Should we extend the end of term date when a student misses hours? For example, the student is enrolled in a 1530 hour program, the schedule hours reached 1530 on 08/25/2015. However, since the student did not have perfect attendance and will not reach her required hours to graduate until 09/21/2015, should we extend her end of term date to 09/21/15, when she is now expected to reach 1530 hours?
- Answer: The original certification was through 8/25/15. You should not extend the term date because of absences. The student has already been paid for 1530 hours. Policy is - do not submit adjustments for absences that are allowed within the schools approved attendance policy. You may not extend enrollment for students who need additional hours simply because of absences. However, if a student failed a portion of the course and has to repeat it, that portion may be re-certified as long as the student continues to meet the Standards of Progress.



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Questions & Answers

- Question: If our normal term dates are September 8th (Tuesday) through December 19 (Saturday). Why can't all the courses within the semester date be certified together? For example: Student is taking 5 classes, 3 credit hours a piece. Semester dates September 8th through December 19th. 5 classes meet: (1: M, W, F 2: T, TH 3: TH 4: M 5: W, S). Would a schedule such as the one above require the school to send in 5 separate certifications all of them with the actual first day and last day of classes or would one certification for the "official semester dates" suffice?
 - Answer: Schools generally should report the first scheduled date of classes for the term, quarter, or semester in which the student is enrolled. Here is an exception: First Day of Classes Delayed. Some courses may begin after the calendar week that the term, quarter, or semester is scheduled to begin. Schools should report the actual date classes for such courses.

In this example –

Class 1, Class 2, Class 3 and Class 5 can be certified with the begin date of 9/8

Class 4 must be certified separately with a begin date of 9/14

All classes can be certified for the same end date – the last official day of the term.



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Questions & Answers

- Question: What's the difference between amending a student's record or adjusting their record on the VA Once website?
 - Answer: There are 3 ways to modify an enrollment.
 - Adjustment – Adjusting the enrollment certificate allows you to report a decrease or increase in hours for the term.
 - Amend – Amending the enrollment certificate allows you to edit the beginning date, ending date, or tuition and fees. This feature should be used if you are correcting something, other than hours, on the original enrollment certification.
 - Terminate – Terminating the enrollment allows you to report when a student is no longer attending the term (dropped to zero credits).

Questions & Answers

- Question: For POE institutions: Do you have examples of emails/letters explaining the websites and complaint system to service members before they enroll? Would you be willing to share?

- Answer: Information and tools relating to the POE are available through the GI Bill website school decisions webpage - http://www.benefits.va.gov/gibill/school_decision.asp

The GI Bill™ Comparison Tool - <http://department-of-veterans-affairs.github.io/gi-bill-comparison-tool/> - is a consumer information tool that guides individuals through the decision process and provides information about schools to assist them to make an informed decision. Complaint data is included within the tool to illustrate potential cues for an individual to be cognizant during the process. Information for the complaint system is provided at <http://www.benefits.va.gov/gibill/feedback.asp>.

DoD's Transition Assistance Program (TAP) was updated to include information about the Comparison Tool.

Questions & Answers

- Question: How would a school report the transfer rate on VA-Once?
 - Answer: The school does not report the transfer-out rate in VA-Once. The school reports Graduation / Certificate Completion in VA-Once. The transfer-out rate is calculated from the data that VA pulls from its internal database.
- Question: If the Outcome Measures are available for prior years too, how do we get there?
 - Answer: The drop down box in step four in the “Outcome Measure Tool” will provide data for the available years.

Questions & Answers

- Question: So the graduation should only be submitted for Chapter 33 students?
 - Answer: Graduation should be submitted for all education benefits. Currently VA is only reporting graduation rates for Ch33 students. However, other education benefits may be included in the future.
- Question: One Veteran earns all F's for a semester and has attended all classes. Another Veteran earns all F's because he stopped attending part way through the semester. Neither are reported because both sets of grades are punitive, correct?
- Answer: Correct. Punitive grades require no further reporting

Questions & Answers

- Question: So if a student can't provide official transcript because they still owe a balance at a number of other schools, we now continue to certify beyond 2 terms? Prior transcripts are no longer required only recommended? Is that a new transcript policy counter to everything we have ever been told. Has the policy changed?
- Answer: VA Central Office recently provided a clarification to Compliance & Liaison staff that SCOs do not have the authority to withhold certification because of an inability to obtain a transcript. However, schools must adhere to their catalog's requirement for matriculation and transfer credit. In order to prevent overpayments from students repeating courses previously successfully completed, every effort should be made to obtain transcripts and evaluate prior credit appropriately.

Questions & Answers

- Question: Could you confirm which law states that “the law requires satisfactory progress for benefits to be administered” (if this is outside the school’s SAP policy and university catalog)
 - Answer: 38 U.S. Code 3680 – CFR 21.4277 (a) Satisfactory pursuit of program. Entitlement to benefits for a program of education is subject to the requirement that the veteran or eligible person, having commenced the pursuit of such program, continues to maintain satisfactory progress. If the veteran or eligible person does not maintain satisfactory progress, educational benefits will be discontinued by the Department of Veterans Affairs. Progress is unsatisfactory if the veteran or eligible person does not satisfactorily progress according to the regularly prescribed standards and practices of the institution he or she is attending.

Questions & Answers

- Question: Is there a way to centralize the payment process instead of individually invoicing each VR&E counselor? The way it is currently processed is there is ONE invoice per counselor, which is a lot of work for our accounting department?
 - Answer: While it is not standard policy to require one invoice per counselor, it is important that invoices are reviewed and authorized by counselors at the local office. This is because each VRC is responsible for authorizing charges that correspond with each individual Veteran's approved plan. In accordance with 38 CFR 21.430, VR&E must maintain policies and procedures that provide accountability in the authorization and payment of program costs for training and rehabilitative services. As stewards of taxpayers' money, the VRC is responsible for and held accountable for the appropriate authorization and processing of payments for services provided to Veterans participating in the VR&E program. The VRC is responsible for ensuring that the Veteran received the invoiced services and that services provided by a vendor are consistent with and necessary for the Veteran's rehabilitation plan of services.

Questions & Answers

- Question: Will the VA Vocational Rehab help them find jobs after graduation?
 - Answer: Yes. Employment Coordinators (ECs) are available throughout a Veteran's participation in training through VR&E, as well as after graduation, to provide employment services as needed. VRCs are also qualified to provide employment services when ECs are not available. Employment services may include, but are not limited to, resume review, interviewing skills, job leads, employment workshops, job fairs, etc.
- Question: When the SCO receives the 1905, the equipment is already listed. For some students it states that they should have a computer, however, our school does not require students to have a laptop? Should I be disallowing this?
 - Answer: No. Although not all schools require students to have a computer, a VRC has the authority to grant one to students on an individual basis as needed. It is the VRC's decision as to whether or not supplies not required by the school should be purchased for a student with a 28-1905. Therefore, schools should allow students to purchase any supply authorized by a VRC via their 28-1905

Questions & Answers

- Question: Why do we still receive paper Authorization forms if we need to report the information via VA-Once? Why can't the approval be given in VA-Once under like the Data tab so that we can see what is current?
 - Answer: VRCs do not have direct access to VA-ONCE. VRCs receive student certifications through an internal case management system that pulls information from VA-ONCE; however, this system cannot communicate back to VA-ONCE. Therefore, VRCs cannot currently submit VA Form (VAF) 28-1905 electronically in VA-ONCE. We hope to have the functionality to transmit VAF 28-1905 electronically via the new case management system we are currently contracting for development; however, we cannot guarantee if/when this will happen.

Questions & Answers

- Question: In determining the amount of entitlement to Veteran for Chapter 31, how does VR&E treat any Chapter 33 transferred entitlement to dependents?
 - Answer: The amount of entitlement transferred to a dependent will count toward the “48 month rule” (38 United States Code [U.S.C.] 3695) if the transferor uses another education benefit. This means that the Veteran’s remaining entitlement under Chapter 31 will be reduced to reflect the amount of entitlement transferred to his/her dependent. For example, if a Veteran transfers 36 months of Chapter 33 entitlement to a dependent, the Veteran will have only 12 months of entitlement remaining to use under Chapter 31. In certain cases, a Veteran may be granted an extension of entitlement beyond 48 months, if the Veteran’s Vocational Rehabilitation Counselor (VRC) determines the extension necessary for the Veteran to complete a vocational rehabilitation program.

Questions & Answers

- Question: How does VR&E deal with amounts paid for tuition, fees, books and supplies when a client withdraws from training (in part of in whole) during the term?
 - Answer: 38 U.S.C. 3680(a)(3) prohibits payment of Department of Veterans Affairs (VA) benefits for a course in which a Veteran withdraws and receives a non-punitive grade that has no quality point value toward fulfilling a facility's graduation requirement and is not calculated into the GPA. When a Veteran decreases his/her training time (i.e. drops classes, leaves school, etc.) and payment has already been processed for tuition and fees, the school will issue any refunds to VA in accordance with the school's published policy. In accordance with M28R.V.A.4, when a Veteran who has been provided non-consumable supplies discontinues training, VA may take action to recoup the cost of the supplies from the Veteran. If this is determined to be the appropriate course of action, the VRC will present the facts, findings and recommendations in the case. The value recouped will be the lesser of the current value of the supplies, or the original cost. Once recoupment is approved, a debt is created against the Veteran's record, and money collected from future VA payments to repay the debt.

Questions & Answers

- Question: If tax is charged for textbooks or supplies will VR&E now pay tax as a fee?
 - Answer: VA can pay sales tax under 38 U.S.C. 3104(a)(7) authority to pay fees. The provision in the law that requires VA to furnish VR&E program participants services and assistance to include payment of “fees” is as follows:

(7)(A) Vocational and other training services and assistance, including individualized tutorial assistance, tuition, fees, books, supplies, handling charges, licensing fees, and equipment and other training materials determined by the Secretary to be necessary to accomplish the purposes of the rehabilitation program in the individual case.

VA is a third-party payer but is not a party to the transaction, which is between the Veteran and the seller, which is why it is permissible for VA to pay sales tax for textbooks or supplies.

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