

Before we begin...

- The webinar will start at **2 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: 72388**
- Slides will be available in 1-2 weeks on our website under the **School Training Resources** page



VBA Education Service Quarterly Webinar

November 17, 2016

Veterans Benefits Administration

VA



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

Agenda

- Atlanta Realignment/Transition
- Audit Requests
- Prior Credit
- Repeat Courses
- Determining the 85/15% ratio
- 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

Realignment of Atlanta Regional Processing Office

POST ★ 9/11
GI BILL

It's Your Future

Atlanta RPO Realignment

- Education claims currently processed in Atlanta RPO are being reassigned to Buffalo and Muskogee RPOs
- Transition is projected to be completed by December 2016
- No action required by SCOs



Audit Requests



Audit Requests

The Quality Assurance Team in VBA Education Service audits randomly selected cases selected by VA's Office of Inspector General (OIG).

As part of that audit, Education Service is required to request additional documentation from educational institutions where VA claimants have attended.

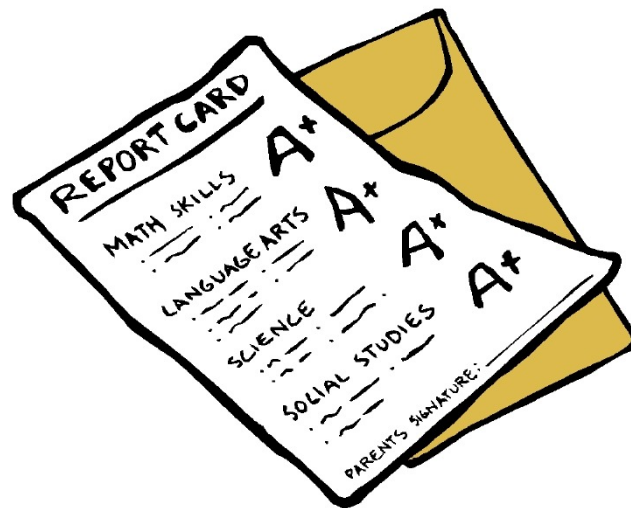
An e-mail will be sent to the educational institution from the address 22Quality.VBAVACO@va.gov



Audit Requests

- Part of the audit requires review of supporting documents for enrollment certifications submitted.
- Per United States Code Title 38 CFR Section 21.4209, Examination of Records, VA requests you send one PDF for the student that includes the following for the specified term:
 - Copy of the transcript
 - Billing/financial records
 - Attendance records (attendance, if taken, for the referenced term)
- Identifying information for the student needs to be on the documents submitted (student last name and last four of social security number).
- Information should be sent no later than 2-weeks from the date of request. Education Liaison Representatives (ELRs) are available to assist if the School Certifying Official (SCO) has further questions.

Prior Credit



Prior Credit

- What is Prior Credit?
- Why is Prior Credit Important?
- What does VA look for on Compliance Survey?

What is Prior Credit?

Any post-secondary education, training, and experience completed by the student, including Military training. Also known as transfer credit or Prior Learning Assessment (PLA).

- Civilian

- Institution of Higher Learning (IHL)
- Non-college degree (NCD)
- Corporate training
- National Testing Programs (CLEP, COMPASS, DSST)
- Portfolio review/assessment
- Challenge exams/test-out procedures
- Correspondence courses

- Military

- Advanced Individual Training (AIT) or Occupational Training (DD 214 or Joint Service Transcript)
- Continuous Learning



Title 38, Code of Federal Regulations, Sections 21.4253(d)(3) and 21.4254(C)(4)

Why is Prior Credit Important?

- Eliminates unnecessary repeats of previously passed courses, saving the student money
- Quicker completion of education or training to enter into the workforce, benefit eligibility conserved
- An approved for Veterans purposes facility must obtain and evaluate prior credit for all VA students
- Schools no longer have to report prior credit to VA

Prior Credit – Compliance Surveys

What does VA look for on Compliance Surveys?

Obtained

- Student supplied (school admission or VA application)
- FASFA/National Clearing House
- VAOnce
- DD214 and/or Joint Service Transcripts

Evaluated

- Completed by an Appropriate School Official
 - Department Dean
 - Registrars
 - Documented in school records



Compliance Surveys, cont.



What does VA look for on Compliance Surveys?

Notification

- Student
- VA (Non-accredited schools only)

Reduced Program

Program reduced or shortened by allowed coursework

Certification of Repeat Courses



Repeat Courses

- Can they be reported to the VA?
- Any Limitations or other considerations?
- What does VA look for on Compliance Surveys?

Repeat Courses

Question: Can they be reported to the VA?



Answer: Depends

How to determine if a repeat course can be reported to the VA

- Is a certain grade required for graduation requirements?
- Has the student obtained the necessary grade for graduation based on your approved school's graduation requirements?

Example 1: Nursing program requires a “B” or better in Biology, then that class may be repeated if a “B” or better was not earned.

Example 2: If a student chooses to repeat a course that was successfully completed, just to improve GPA, that course cannot be certified to VA.

Repeat Courses

Question: Any Limitations or other considerations?

Answer: Could be

Does not matter how long ago the original courses were taken.

Does not matter where they were originally taken.

Does not matter the modality in which they were originally taken.

Does not matter if the student was receiving VA education benefits when they originally took the course.

Does not matter if the student has declared academic bankruptcy, other known as, erasing grades from all prior semesters for returning students.

Repeat Courses

What does VA look for on Compliance Surveys?

- Catalog policy on graduation requirements for individual programs.
- Transcripts showing the prior attempt and grade received.
- Enrollment certifications and justification for what was or was not certified to the VA.



Repeat Courses

Additional information:

Students may not repeat courses for VA purposes just to increase grade point average (GPA)

When multiple attempts, greater than 2, have occurred, the school must follow their catalog policy regarding prior attempt courses. Notify VA accordingly for any non-punitive grades received as normal.

Each school has their own repeat policy and how repeat courses impact the student's GPA and graduation requirements, each SCO should be very familiar with their school's own policies.

Determining the 85/15% Ratio



85/15% Ratio

- Why is 85/15% ratio monitored?
- How are students counted?
- How is it calculated?
- When to report the calculation to VA?
- Where is the 85/15% ratio report sent?
- What happens when a program is out of compliance with the 85/15% ratio?

85/15% Ratio

Why is 85/15% ratio monitored?

The Department of Veterans Affairs shall not approve an enrollment for eligible veterans in any course where more than 85 percent of the students enrolled in the course are supported students.

85/15% Ratio

How are students counted?

Supported vs. Non-supported:

- The following are examples of supported students
 - Students who receive VA educational benefits
 - Students receiving institutional aid that veterans do not have access



85/15% Ratio

How are students counted?

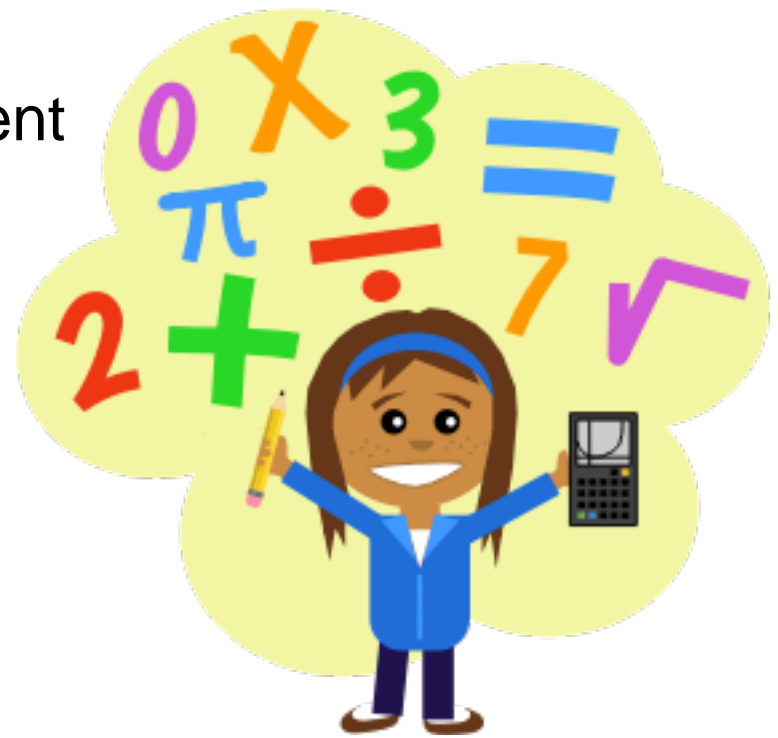
Supported vs. Non-supported:

- The following are examples of non-supported students:
 - Students who are not veterans or reservists, and are not in receipt of institutional aid.
 - All graduate students in receipt of institutional aid.
 - Students in receipt of any Federal aid (other than Department of Veterans Affairs benefits).
 - Undergraduates and non-college degree students receiving any assistance provided by an institution, if the institutional policy for determining the recipients of such aid is equal with respect to veterans and nonveterans alike.

85/15% Ratio

How is it calculated?

Non-supported students will be compared to the full-time equivalent students enrolled in the course.



85/15% Ratio

When to report the calculation to VA?

- Schools organized on a term, quarter, or semester basis, shall make that submission no later than 30 days after the beginning of the first term
- Schools not organized on a term, quarter or semester basis, shall make that submission no later than 30 days after the beginning of the first calendar quarter for which the school wishes the exemption to apply.

85/15% Ratio

Where is the 85/15% ratio report sent?

- Send to Educational Liaison Representative (ELR) of jurisdiction
- Submit by mail, email or fax



85/15% Ratio

Program Name:	MS-Areospace			
Term:	Spring Semester			
Actual dates of Term:	08/15/2016 - 12/02/2016			
	Student receiving aid from the Educational Institution (Column A)	Student receiving or will receive VA education benefits (Column B)	Non-supported student (Column C)	
Student Name:				
John Doe		1		
Jane Doe			1	
Ann Doe	1			
Sammantha Doe			1	
Lynn Doe			1	
	Total of Column A	Total of Column B	Total of Column C	Total Students
	1	1	3	5
		Supported Students (Column A+B)	% of total # students	
		2	40.00%	

85/15% Ratio

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6
Program Name	Number of FTE VA and Institutional Supported Students	Number of FTE of nonsupported Students	Total Enrollment	% of Supported Students	Date of Cacluation
BS-Areospace	18	20	38	47.37%	09/02/2016
BS-History	25	4	29	86.21%	09/02/2016
BS-Mathematics	40	50	90	44.44%	09/02/2016
MS-Areospace	2	3	5	40.00%	09/02/2016
MS-Educational Leadership	19	5	24	79.17%	09/02/2016
I certify that this information is true and correct as of the date submitted.					
_____ Signature			_____ Date		
_____ Printed Name:			_____ Title		
_____ School Name:			_____ VA Facility Code		
_____ Address:					

85/15% Ratio

What happens when a program is out of compliance with the 85/15% ratio?

- Programs with ratios over at or above 85% are suspended from any new VA enrollments.
- ELR notifies the facility that programs are suspended from any new VA enrollments.
- After the submission of future 85/15% ratio reports, prior suspended programs will be reviewed for compliance, suspension either continued or lifted.
- ELR notifies the facility when suspension is lifted.



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 published in September 2015
 - Further revisions are in progress in advance of the fall semester.
- 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-85/15

Question #1: Can you please clarify non-supported students?

Answer # 1: Non-supported students include any non-VA students who are not receiving any institutional aid that is essentially not available to VA students. See page 120 of the [SCO Handbook](#).

Question # 2: How often do we submit the 85/15 ratio?

Answer #2: 85/15 Ratio reports must be submitted to your ELR within 30 days of the start of each major quarter or semester.

Questions and Answers-85/15

Question #3: Regarding the flight addendum - do schools now have to list out each aircraft for 85/15? What about courses that utilize multiple aircraft in the class?

Answer # 3: You do not need to calculate the ratio for each aircraft. Where cost is involved, you only need to report a separate ratio where the associated cost is more than the cost published in your catalog or an addendum.

Question # 4: When calculating the 85/15 do we need to include concentrations or just programs?

Answer #4: Any concentration that comprises a separate curriculum is also considered to be a separate program; accordingly, a separate ratio calculation is required for each concentration.

Questions and Answers-85/15

Question #5: In the past, SCOs would receive a letter in the mail regarding schools wishing to seek the 85/15 exemption. Will the SCOs continue to receive a letter prompting us to request the exemption? It sounds like this practice is discontinued per the webinar.

Answer # 5: Education Service is not aware of any letter automatically sent to SCOs regarding any exemption from the ratio. If you are referring to the 35% waiver of reporting requirements, your ELR will notify you in a letter after receipt of an appropriate report of the ratio that this waiver has been granted.

Question # 6: We were told that the 85/15 report would be maintained at the school but not sent to the ELR unless we were not compliant. Are they now supposed to be sent to the ELR each semester?

Answer #6: A report of the ratio for each program must be submitted to the ELR each semester or quarter unless the school meets the requirements of the 35% waiver. That is a waiver of the reporting requirements of the ratio and does not nullify the school's responsibility to calculate and check the ratio for each program for each semester or quarter.

Questions and Answers-85/15

Question #7: Are we exempt from the 85/15 rule if we are close to a military installation?

Answer # 7: There is an exclusion from the ratio for schools and branches that meet specific requirements: They

- must be located on or immediately adjacent to a military base or Reserve Center/National Guard facility,
- must be operating under a contract with DoD for that base, and
- your enrollment must be limited to active duty military, civilian employees of the base, and their dependents, 38 CFR 21.4201(3).

Your SAA and ELR approves those arrangements and exclusion.

Questions and Answers-Compliance Surveys

Question #8: If we request official transcripts from students and they do not comply, as long as we can verify that we've made request more than once, will we still be dinged on the audit?

Answer # 8: As long as you can show due diligence by making timely requests, then you should not be dinged. However, you should discuss this with your State Approving Agency. Many SAAs have additional reasonable approval criteria regarding what schools should do regarding prior credit. Some of those rules include what you should do if transcripts are not received.

Question # 9: Are we cited a finding on a compliance survey if we do not have either the DD-214 or the JST on file and evaluated for a veteran?

Answer #9: If you did not exercise due diligence in trying to obtain those documents for the purpose of evaluation for prior credit, then you will be cited. Also see answer #8 above relating to SAA additional reasonable approval criteria.

Questions and Answers-Prior Credit

Question #10: Now that prior credit is no longer required to be reported, what should be reported in VA-Once?

Answer # 10: You need not make any entry in VA-ONCE for credit for prior training.

Question # 11: Is it correct we cannot refuse to certify a student if they will not submit official transcripts for evaluation and we just need to show that we've requested the transcripts?

Answer #11: Some SAAs may have an additional reasonable approval criteria (ARC) that requires you to stop certifying a student's enrollment after a specified period of time if transcripts are not forthcoming. The authority for ARC is found in 38 CFR 21.4253(d) and 21.4254(c)(14). Also see answer #8 in the previous slide.

Questions and Answers-Prior Credit

Question #12: What if an institution does not have a transfer credit policy requirement? Does VA need to create their own policy to implement this rule?

Answer # 12: An institution that does not have a transfer credit policy cannot be approved for veterans' training. Review, evaluation, and granting of appropriate credit is a requirement of the law. 38 USC 3675(b)(2) and 3676(c)(4). See page 49 of the [SCO Handbook](#).

Question # 13: Does VA dictate any deadlines/timelines for transcript evaluations?

Answer #13: VA does not dictate any deadlines for transcript evaluations, but as noted in the previous slide, your SAA may do so.

Questions and Answers-Prior Credit

Question #14: What if an institution won't accept "stale" credits?

Answer # 14: If by "stale" credits you mean credits that were earned too long ago to be accepted today, as long as it is your school's published and approved policy not to accept any credits earned beyond a certain date or period of time, then that policy may be applied and enforced.

Question # 15: If our policy is not to transfer anything over 7 years and the Veteran was in the military more than 7 years ago, do we still have to obtain military transcripts?

Answer #15: You should consult with your SAA regarding any policy they have approved; however, as a general rule, in such an instance it would not be unreasonable to not require a student to submit transcripts that old, including military transcripts.

Questions and Answers-Prior Credit

Question #16: What qualifies as making every effort to collect a student's transcript?

Answer # 16: That is an issue you should discuss with your SAA.

Question # 17: If a student takes a class at another college and we do not give transfer credit for the class, will VA pay again?

Answer #17: In such an instance if you properly applied your published and approved transfer credit policy, the credit was not granted, and the course in question will apply to the student's current program, that student may be certified to VA for taking that course at your institution. See pages 49-50 in the [SCO Handbook](#).

Questions and Answers-Prior Credit

Question # 18: Are we required to obtain military transcripts for guest students?

Answer #18: If you are certifying the enrollment of a guest student who is not matriculated at your school and based on a letter from the parent school authorizing that student to take a particular course or courses at your school for transfer back to the parent school, a transcript review for prior credit is not required.

Question #19: With the facility being required to obtain and evaluate prior credit, what is the protocol if a student is unable to obtain transcripts from a prior institution of higher learning they attended?

Answer # 19: You should consult with your SAA regarding any such protocols.

Questions and Answers-Prior Credit

Question # 20: What if we pay a student for a class that they have already passed at another school and we did not get the transcript before the certification was done?

Answer #20: Once the transcript from the prior institution is received and credit is properly granted, you should amend the certification of enrollment that includes that course to reduce the student's credit hour load as appropriate.

Question #21: How does prior credit apply to NCDs and certificate programs?

Answer # 21: It applies just the same as to degree programs at IHLs. Records of all prior education and training must be obtained and evaluated, and credit granted as appropriate based on your published and approved policies and procedures.

ver #23 Questions and Answers-Repeated Courses

Question #22: If the course is repeatable by financial aid standards is this ok?

Answer # 22: Financial aid standards are not relevant to certifications for VA education benefits. You must apply the policies and procedures regarding such situations as approved by your SAA.

Question # 23: What if a student does not want to transfer credits for a course previously passed and wants to take it at our institution because it is taught differently?

Answer #23: A student's desire not to have prior credit transferred and applied to his/her program is not relevant. VA eligible schools must obtain and review all prior credit and grant credit toward the student's current program as applicable under their published and approved standards.

Questions and Answers-Repeated Courses

Question #24: If a student finishes all classes for degree but the GPA is too low to graduate, can they take a repeat class to raise the GPA?

Answer # 24: A school may again certify the enrollment of students in a class only if that student did not earn a satisfactory grade in that class. See page 47 of the [SCO Handbook](#).

Question # 25: Can a student repeat a course they previously passed as part of rounding out?

Answer #25: Yes, a student can pursue any approved course for the purpose of rounding out, including subjects previously satisfactorily completed. See page 49 of the [SCO Handbook](#).

Questions and Answers-Repeated Courses

Question #26: We have certification courses at NCD such as A+ and these courses change. Can a student take these types of courses again?

Answer # 26: Once a student has successfully completed a course, the only time they may be paid to retake it is if they originally passed that course before or during their active military service. In such cases the school would need to document that this particular course had changed significantly since the student pursued it in order for VA to pay for that student to pursue it again. If the student successfully pursued the original course after leaving the military, VA will not again pay for that student to pursue that course even if it has changed. See pages 47 and 128 of the [SCO Handbook](#) regarding refresher training.

Question # 27: If we do not take attendance and a student fails a course, do I have to report this to VA?

Answer #27: In such an instance where your school does not routinely take attendance, you only report the last date of attendance for a failure (F grade) if it is specifically indicated in your grading system to be an F issued for withdrawal or failure to attend such as a WF grade.

Questions and Answers-Repeated Courses

Question #28: Can a student repeat courses as many times as needed if it's required for the program and the student maintains SAP?

Answer # 28: A student may repeat a course as many times as allowed under your published and approved academic policies in order to earn a satisfactory grade and you may certify the student's enrollment each time. Just be sure to document the specific school approved policy that allows for it.

Question #29: A student who pays for a course out of pocket and then becomes eligible for VA educational benefits repeats the previously passed course; will VA pay for the student to repeat this course?

Answer #29: No. Rules governing credit for prior training do not restrict the granting of prior credit to courses pursued under VA education benefits. If the student successfully completed a course at their own expense, the school cannot certify that student's enrollment in that course again unless for some reason your published and approved rules prohibit granting credit for that particular course.

Questions and Answers-Repeated Courses

Question #30: It is my understanding that VA students can not repeat aviation lab classes

Answer # 30: If a student receives a failing (F) grade in any course that applies to that student's program of education, including aviation lab courses, the student may be certified for a subsequent enrollment in that class in order to pass it.

Question #31: Do CLEP exams remove any portion of VA Benefits?

Answer # 31: CLEP is treated the same as credit for prior training. If credit is granted towards a student's program because of CLEP, then that will shorten the student's program and reduce the time it takes for the student to complete that program just the same as credit granted for courses transferred to your school via transcripts.

Questions and Answers-General

Question #32: Which payment takes precedence when a student has State TA money and Federal TA money; both are restricted to paying tuition?

Answer #32: Title 38 USC, Section 3313 specifies that VA will pay the cost of in-state tuition and fees "after the application of...any scholarship,, or other Federal, State, institutional, or employer-based aid or assistance...that is provided directly to the institution and specifically designated for the sole purpose of defraying tuition and fees." It goes on to exclude Federal financial aid under Title IV from this calculation. What this means is that you apply the state or federal TA first as long as those funds are designated solely to defray the cost of tuition and fees, then certify any unmet appropriate charges for tuition and fees to VA. See pages 86 and 87 in the [SCO Handbook](#) for further information.

Questions and Answers-General

Question #33: Are pre-college courses covered for online campuses?

Answer # 33: If by "pre-college courses" you mean remedial or deficiency courses such as remedial English and math, 38 CFR 21.4267(g) specifically prohibits the payment of VA education benefits for such courses offered by independent study. That term includes modes of delivery such as online training, distance learning, etc. See page 48 of the [SCO Handbook](#).

Question #34: What exactly is the function of the CELO?

Answer #34: Each Chief Education Liaison Officer (CELO) is the supervisor for all the ELRs and ECSSs based within their area of jurisdiction. There are three such areas based in Buffalo, NY; Muskogee, OK; and St. Louis, MO. They also perform other functions such as conducting the final review of SAA performance evaluations and are the chief contact in the region for ELRs regarding the applications of VA education laws and regulations. Most also have Supervisory ELRs who assist in these tasks.

Questions and Answers-General

Question #35: Are internships considered independent learning to be submitted as distance learning on enrollment certifications?

Answer # 35: If an internship meets the requirements of 38 CFR 21.4265, (which usually includes accreditation), it may be approved as in-resident training as opposed to distance learning. See also page 128 of the [SCO Handbook](#).

Question #36: When manually re-calculating GPAs for benefit purposes - are only semesters in which the student used VA benefits considered or all semesters?

Answer #36: It all depends upon the grading system and standards of academic progress approved by your SAA. If you have questions as to how to apply those policies you should discuss it with your SAA. However, all things being equal, all enrollment periods that your approved school academic policies would count in the GPA for each student will also count in the GPA for each VA student regardless as to whether that student received VA education benefits for that pursuit.

Questions and Answers-General

Question #37: Will VA allow an increase in enrollment credits as long as we report the adjustment before the course begins?

Answer # 37: If the increase is allowed under published school policies, you have 30 days from the date the course or courses were added to report that increase to VA.

Contact Us

Website: www.benefits.va.gov/gibill

Facebook: www.facebook.com/gibilleducation

