

VA



U.S. Department
of Veterans Affairs

Colmery Act Section 107 Recertification: Scenario Basics

Target Audience: SCOs

April 2020



Background



Why do we need to recertify enrollments?

VA is required to pay the student's Monthly Housing Allowance (MHA) based on where **the individual physically attends the majority of their classes** for any enrollment, including quarter, semester, or terms, as applicable, beginning on or after August 1, 2018. IT systems were updated to calculate MHA in accordance with **Section 107 of the Colmery Act** on December 1 of 2019, **all enrollments between August 1, 2018 and December 1, 2019 will need to be recertified to the correct campus.**



What is the difference between a Main, Branch, and Extension Campus?

- **Main Campus:** A location where the primary teaching facilities of an educational institution are located.
- **Branch Campus:** A location of an educational institution that is **geographically apart from and operationally independent** of the main campus of the educational institution.
- **Extension Campus:** A location of an educational institution that is **geographically apart from and is operationally dependent of the main campus or a branch campus** of the educational institution.



What is the Recertification Waiver?

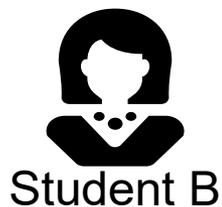
The Recertification Waiver will allow schools to forgo recertifying enrollments **if and only if:**

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

*Military Housing Area is a grouping of zip codes used to compute Housing Allowance.



Scenario 1: Campus Location Example 1



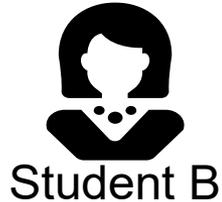
Enrollment Term Start Date	Hours at Main Campus	Hours at Extension Campus(es)*	Online/distance Hours	Original Enrollment Certification	Does this enrollment need to be recertified?
Jan. 12, 2019	6	0	6	Main – 6 hours Online – 6 hours	No
Jan. 12, 2019	6	6	0	Main – 12 hours	Yes

*Assume any extension campuses are NOT eligible for a waiver

Student A's enrollment does not need to be recertified because they did not take any classes at an extension campus. **Only enrollments where the student attended classes at an extension campus(es) but were certified to a main or branch campus, with a term start date on or after August 1, 2018, will need to be recertified.**



Scenario 2: Campus Location Example 2



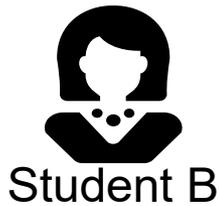
Enrollment Term Start Date	Hours at Main Campus	Hours at Extension Campus(es)*	Original Enrollment Certification	Does this enrollment need to be recertified?
Jan. 12, 2019	9	3	Main – 12 hours	Yes
Jan. 12, 2019	3	9	Main – 12 hours	Yes

*Assume any extension campuses are NOT eligible for a waiver

Both student's enrollment need to be recertified because they were certified to the main campus, when they were taking some classes at an extension campus. **Enrollments where the student attended classes at an extension campus(es) but were certified to a main or branch campus, with a term start date on or after August 1, 2018, will need to be recertified.**



Scenario 3: Campus Location Example 3

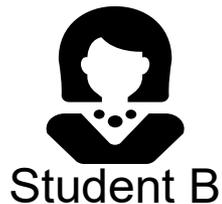


Enrollment Term Start Date	Hours at Extension Campus with lower MHA rate	Hours at Extension Campus with higher MHA rate	Original Enrollment Certification	Does this enrollment need to be recertified?
Jan. 12, 2019	12	0	Main – 12 hours	Yes
Jan. 12, 2019	0	12	Main – 12 hours	Yes

Both student's enrollments need to be recertified because they were certified to the main campus, when they were taking some classes at an extension campus that is NOT eligible for a recertification waiver. **Monthly Housing Allowance rate does not impact whether or not an enrollment needs recertified, unless the extension campus is eligible for a recertification waiver.**



Scenario 4: Waiver Eligibility Example 1



Enrollment Term Start Date	Hours at Extension Campus(es) in SAME Military Housing Area	Hours at Extension Campus(es) in a different Military Housing Area	Original Enrollment Certification	Does this enrollment need to be recertified?
Sept. 9, 2019	9	0	Main – 9 hours	No (waiver eligible)
Sept. 9, 2019	0	9	Main – 9 hours	Yes

Student A's enrollment **does not** need to be recertified because their enrollment occurred at an extension campus that is eligible for a recertification waiver. **SCOs may forego recertifying enrollments at extension campuses located in the same zip code or Military Housing Area for terms with start dates of August 1, 2018 to November 30, 2019.** Check your [Extension Campus Report](#) for waiver eligibility.



Scenario 5: Waiver Eligibility Example 2



Enrollment Term Start Date	Hours at Extension Campus(es) in SAME Military Housing Area	Hours at Extension Campus(es) in a different Military Housing Area	Original Enrollment Certification	Does this enrollment need to be recertified?
Dec. 2, 2019	9	0	Main – 9 hours	Yes
Sept. 9, 2019	9	0	Main – 9 hours	No (waiver eligible)

Student A's enrollment **does** need to be recertified because their enrollment occurred at an extension campus with a term start date on or after December 1, 2019.

Recertification waivers for extension campuses in the same Military Housing Area are only applicable for enrollments with term start dates of August 1, 2018 to November 30, 2019.



Scenario 6: Term Start Dates Example 1


Student A

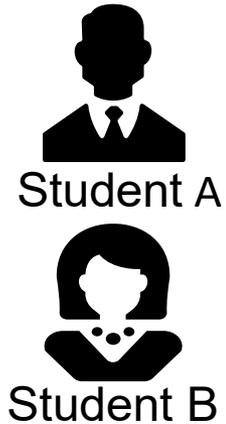

Student B

Enrollment Term Start Date	Hours at Main Campus	Hours at Extension Campus(es)	Original Enrollment Certification	Does this enrollment need to be recertified?
Aug. 22, 2018	8	4	Main – 12 hours	Yes
June 6, 2018	8	4	Main – 12 hours	No

Student B's enrollment **does not** need to be recertified because it started prior to August 1, 2018. Remember, **only enrollments with term start dates on or after August 1, 2018 will need to be recertified** if they were taken at an extension campus. **Note:** the location of the majority of classes does not impact whether or not an enrollment needs to be recertified.



Scenario 7: Term Start Dates Example 2



Enrollment Term Start Date	Hours at Main Campus	Hours at Extension Campus(es)	Original Enrollment Certification	Does this enrollment need to be recertified ?
Dec. 2, 2019	3	9	Main – 12 hours	Yes
Dec. 2, 2019	3	9	Main – 3 hours Extension(s) – 9 hours	No

Student A's enrollment **does** need to be recertified because the student was certified to the main campus, when they were taking some classes at an extension campus. Remember, **all enrollments that start on or after December 1, 2019 must be certified to the correct location.**



Resources and Tools for School Administrators

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

107 Recertification Resources:

- ✓ [April Section 107 Recertification Training](#)
- ✓ [How to recertify: VA-ONCE Demo Videos & Recertification Quick Reference Guide](#)
- ✓ [The Facility Extension Campus Report](#) – identifies which extension campuses are eligible for waiver
- ✓ [Forever GI Bill: Communications Toolkit](#)

Stay up to date on GI Bill benefits

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School Resource Page

<https://www.va.gov/school-administrators/>



SCO Training

https://www.benefits.va.gov/gibill/resources/education_resources/school_certifying_officials/online_sco_training.asp



FAQs

<https://gibill.custhelp.va.gov/app/answers/list/session/L3RpbWUvMTU3MTIxOTM4MS9zaWQvcWxoS0Vzcm8=>



School Certifying Official's Handbook

https://www.benefits.va.gov/GIBill/docs/job_aids/SCO_Handbook.pdf