

# Education Service Quarterly Webinar

June 12, 2018

## Questions and Answers

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## Section 107-

1. What if all classes are online?

VA will continue to pay distance learning as they have in the past (1/2 the national average). The changes apply to "in-residence" or "physically attending" courses.

2. Can we certify students now who are taking all online courses or should we hold them? Basically, will there be additional data requested for those students other than all hours being distance?

You can certify students taking all distance courses. They will be paid based on half the national average.

3. What if taking 9 hours online and 3 on campus?

If a student is taking at least one credit in-residence, they will receive the in-residence MHA rate and not the online training MHA rate.

4. How would certify a hybrid undergrad class that meets 6 times (every other week) in a classroom and the rest of the instruction is online over the course of our 12-week term, and how will the student be paid housing stipend?

Section 107 of the Colmery Act does not change how a school determines if a course is considered to be taken "in residence" or "distance". Page 54 of the SCO Handbook outlines how schools should determine how a particular course should be classified. If you have a question about how a specific course should be classified, you should contact your ELR.

5. If a student is taking courses online, and one class locally in their area, do we hold their certifications for fall?

If the one course is NOT at the zip code associated with the facility currently in WEAMS, then Yes, you should hold the certification

6. What if most classes are at the main campus, but a few are online? Can these be reported at this time?

If the majority of classes ARE at the zip code associated with the facility currently in WEAMS, and the remainder are online, then Yes, you can report the enrollment at this time.

7. As far as being able to submit in VA ONCE, can we submit certifications for students taking a combo of classes at the main campus and online?

Yes

8. What defines majority of classes? 51%?

0.50001



9. Our graduate students are enrolled in a distance learning program; they are on campus for a two weeks residency, but after that, they do their work from home. How would we create facility codes for each individual student's home address?

The new law did not change MHA calculations for distance learning programs. Therefore, the MHA for individuals enrolled in these online programs will continued to be paid as they are now.

10. What about when it's 50 / 50?

When a student is taking an equal number of classes at two locations, VA will pay the higher MHA rate.

11. We have Physician Assistant students and other students who do many clinical rotations over the second half of their educations. Do we need to submit each rotation as a separate "semester" or training period if they will be in different zip codes? And then, if they have classroom learning, submit that separately, as well?

Yes.

12. For the Aug 2019 catalog requirement, are we publishing the zip codes for places training took place in the past term/year? In other words, we won't know the zip codes for upcoming fall 2019 internships when the catalog is published in June 2019.

Schools will be required to report zip codes of training locations in their course catalogs; however, schools will not be required to report the zip code location of the internship, clinical locations in their course catalog. It will be required to clearly identify an internship or externship is needed to complete the program or course.

13. Is there any discussion about reviewing hybrid courses and how they are coded as distance learning based on the <50% of classroom time.

Not at this time.

14. Multiple school campuses with separate zip codes, how does the BAH apply to both campuses?

The SCO will need to report the zip code separately for each course training location (campus).

15. If a student graduates from their Community college Spring 2018 and enrolls in the senior institution for Fall 2018, will they be grandfathered into the Pre-Colmery (higher BAH) or will they receive the new rate under the Colmery Rate?

A student that began receiving MHA under Post-9/11 GI Bill prior to 01/01/2018 will receive MHA rates based on the VA Rate table, all others will be subject to the DOD rate table.

16. Will VA Once accept zip codes for foreign countries for study abroad?

Foreign schools will be paid the standard Foreign school rate, not by zip code.



17. With the new zip code process, will schools that currently have multiple facility codes be able to reduce to 1 facility code and use zip codes instead?

The school should speak with their ELR and/or SAA to determine if this is a possibility.

18. If a student has a clinical that meets on campus once a week as well as meeting at the clinical site each week, what zip code is used for certification? Clinicals (outside of campus zip code) do not have credit hours, so would we continue to not certify these clinicals?

The clinical should be reported based on where the student attends the majority of the time. If a clinical is zero credit hours and it is not required for program/course completion then it does not need to be reported to VA. However, if it is measured in clock hours/credit hours and required for program/course completion, then it will need to be entered the number of clocked hours into the system and the Long Term Solution will perform the conversion to determine the time spent at that location.

19. RE: Slide #10 What do schools do when they have a shared Facility Code for two campus locations? Is there a published rule (yet) for schools with satellite campuses located in two separate zip codes? We share the facility code. Thanks!

Schools will need to report the zip code for each location and continue to use the same facility code.

20. After the last VA Webinar in March 2018, the Q&A were published on the VA website and the very first question was about zip code for 100% distance learning. The answer was that we should use the zip code for the school in WEAMS. Tawny's answer above says a zip code is NOT being used for distance only students. Which is correct?

Distance processing remains the same, it is based on half the national average. It has and will continue to use the zip code in WEAMS and is unaffected by this change.

21. We have three other campuses but only one facility code, if a student is taking all classes at another campus zip code, will they be paid off that zip code?

Yes, they will be paid based on the campus zip code where they "sit in a seat" the majority of the time.

22. When you say to wait until further notice to submit certifications if a student is taking a course outside our facility zip code or location. If a student is taking a total of 12 units, 9 units of which are in our facility zip code and 3 units are outside our facility zip code or location. Is it ok to submit the 9 units for now and submit the other 3 units later until further notice? Or do you want us to wait to submit all 12 units until further notice?

Please hold all certifications

23. Where are you confirming school zip codes? WEAMS? and if so how can this be updated instantly besides from contacting our ELR

All requests to update zip codes must go through your local ELR.



24. If a Ch. 33 student takes all courses on my main campus (where the zip code matches my Facility Code), can I submit that certification now or do I need to wait for VA Once IT updates?

If all classes ARE at the zip code associated with the facility currently in WEAMS, then Yes, you can report the enrollment at this time.

25. Will we have to have all zip codes for any externship/internship enrollments approved through SAA before we can certify?

No, zip codes for externships/internships do not need approval prior to certification.

26. If a study abroad course involves travel with no base of operations, what zip code is used?

Study abroad courses will receive the foreign rate.

27. We have three campuses with one facility code. May I certify students who are taking classes at any of these three campuses? BAH rate is the same for all, but only one listed in WEAMS. You answered "Answer: No, you should hold all certifications.

If the classes are at different zip codes, you should hold all certifications.

28. In regard to eligibility, the student only needs take at least one residential course to receive BAH, correct? Will these new rates be published soon?

The student needs to be pursuing an approved program at more than half-time basis.

29. Will student teaching sites have to now be approved as teaching sites on institutional state approvals so the zip code is approved? Will student teaching be certified according to the zip code where the majority of the course is taught?

The zip code of a "Student teaching site" will be used for processing housing if the majority of hours are at that site.

30. The slide says that we need to hold enrollments if they have ANY courses outside the main zip code. However, the speaker says we can process them if the majority are at the zip code in WEAMS? Please clarify if we need to hold these or process these

If all courses are at the Zip Code in WEAMS, SCOs can go ahead and certify at this time

31. Our campus has one zip code for academic buildings, another for residence halls. Classrooms are actually in both types. Plus we have a few buildings we have bought that are still in a third zip code (town). Does this mean we need to narrow down even the on campus zip codes if they are different than our facility zip code (which is an admin building)?

This means that you will report the zip code of each building, residence hall, etc. where classes are held.

32. So if a student is enrolled in 12 credit hours on our main campus and 1 credit hour on another campus outside of the main campus zip code, we can go ahead and certify?

No, please hold.



33. We offer Nursing courses where the practicum location is not known until shortly before the course begins. Can I use the local campus zip code and then change it when I know the practicum site zip code later?

No.

34. For students taking a majority of classes in another zip code, who needs to provide the zip code to the certifying official? The student? The professor? The hosting organization?  
Thanks!

The certifying official will be responsible for reporting the zip code to VA.

35. Do you plan to provide more details on our requirement to submit all possible zip codes?

Yes.

36. Are there any updates concerning how institutions will report the alternate zip codes?

Additional info will be released soon.

37. We have 1 facility code that has a zip code associated to a PO Box. The PO Box is where we receive all mail. None of our campus' use this zip code as the physical location. I was told to use the address where we receive mail. How will this affect our certifications?

A physical address zip code should be reported for all courses.

38. Externship can be completed almost anywhere, how do I get all of the possible zip codes approved

Externship zip codes do not require approval.

39. Does the VA have any idea how much additional time will need to be spent on each certification if we need to determine where every class is being taken and then report each enrollment separately? Since a BAH is for housing, doesn't it make more sense to pay students based on where they live?

BHA will be paid based on where a majority of classes are taken.

40. Several of our internships do not have their site (zip code) assigned until well after the semester begins. How do report internships where we do not yet have a location/site?

VA will release more information soon on how to report internships when a zip code is not known.

41. Can I rely on <http://www.defensetravel.dod.mil/site/bahCalc.cfm> for the 2018-2019 housing allowance rates? Or is there a +/- for MHA?

Yes you can rely on that site for the DOD rate for those who first received housing on or after August 1, 2018.



42. Courses or credits?

Majority of credits (factoring in equivalent credit hours) is the basis for deciding the zip code to use when calculating the housing rate.

43. Does this apply to a guest student regarding housing allowance

Yes.

44. Based on statements related to the hold request, it is acceptable to submit fall certification for all fall courses if there is a clear majority of courses offered at the main campus covered by the current facility code. Please confirm I understood that correctly.

If all courses are at the Zip Code in WEAMS, SCOs can go ahead and certify at this time

45. Can schools with one facility code request an additional code?

The MHA will be calculated based on the Zip Code of the location where the student takes the majority of their classes ("teaching location"). Multiple "teaching locations" can share a single facility code, even if they have different Zip Codes for the purposes of calculating MHA.

46. If a student is approved for one study abroad course which correlates to FT, what is the foreign rate for MHA?

Foreign rate is calculated at the national average.

47. What about medical schools who have students attending multiple practicum sites throughout the semester? Will we be able to report/certify multiple sites with our certifications?

The MHA will be calculated based on the Zip Code of the location where the student takes the majority of their classes ("teaching location").

48. you're saying "majority" of classes but the slide says if they are taking "ANY" courses at another location we should hold the cert for now. Which is it? Majority of classes or Any class?

If ANY courses are taken at a teaching location with a different Zip Code, then SCOs should hold the certification.

49. What is the reasoning for not paying a student MHA for their parent institution when studying abroad? These are viewed as enrichment opportunities for students that are added value and make them a better rounded student. By having pay at the foreign rate, this limits this opportunity for many of our students.

Students will be paid based on the zip code of the teaching location; they will no longer be paid based on the location of the institution.



50. How should the SCO handle certs submitted for those students who, at the time of the cert, were enrolled in all courses at the campus location of the facility code shown on the enrollment certification, BUT, then the student switches courses and enrolls in a course(s) at a different location, other than the one represented by the facility code being certified. Would the SCO do an adjustment? Terminate?

Yes, the SCO would submit a change/ adjustment to reflect the change.

51. I have many students that do not know where their internship/practicum will be until just before (or at) the beginning of the term. How do you suggest I dual certify these students?

VA will release more information soon on how to report internships when a zip code is not known.

52. Will there be a calculator students can use to determine their MHA? Will you be communicating these changes to the students?

VA's GI Bill Comparison Tool shows the maximum MHA the student may receive.

53. How do we find out if any of our branch centers are included under our facility code?

Zip codes for all branch campus should be reported.

54. We have a main campus, and also technical campuses in other towns. All have been certified under the same facility code. Will our technical campuses now have separate facility codes?

No, extensions of the main campus and technical campuses will not have their own facility code. The MHA is now calculated based on the Zip Code of the location the student physically takes the majority of their classes ("teaching location"). There is no need for other branch campuses or any locations to have their own facility code.

55. To clarify, Voc Rehab certs are NOT affected by the Section 107 updates, correct? Are we good to certify Ch 31 as normal or will those need to be held as well if the student is not attending solely (majority) on campus?

You can continue to certify Chp 31 enrollments as normal.

56. Hello, are apprenticeship programs eligible for tuition program payments under GI Bill programs? can students who are veterans receive their housing allowance for the academic portion of their training? If so, who at the headquarters level can we contact for the appropriate details for our SCO's and students?

To determine if your apprenticeship program is approvable for GI Bill funding, you should contact your SAA.

57. can students who are veterans receive their housing allowance while participating in their classroom training, before OJT?

OJT rules have not changed under Colmery.





58. Can you discuss grandfathering?

As it relates to Section 501 (DOD/VA rates), VA will grandfather MHA if the student previously received a monthly housing allowance for training at the same Zip Code; and the student is continuously enrolled at the same Zip Code.

59. Do National Tests included placement tests (Ex. ACT, SAT, ACCUPLACER)?

To see a list of all approved National Exams visit:

<https://inquiry.vba.va.gov/weamspub/buildSearchNE.do>



## Section 305-

1. Is there a way SCO's can get notified of the webinars that will be taking place? How will SCO's get notified of when they have to take the required training?

Webinar schedules are posted on the GI Bill website under School Resources and Training. The SCOs will be notified by their ELR when they have to take the training. For SCOs starting on or after August 1, 2018, once the 22-8794 is submitted to the ELR, the ELR will provide the SCO with a link to access the training.

2. Is there time limit for the SCO's to get certified and complete the training?

SCOs starting on or after August 1, 2018, have two weeks to complete the required training. Starting August 1, 2019, existing SCO will have one year to complete the training; (from Aug 1, 2019 thru July 31, 2020).

3. Will we receive training credit for attending conferences. If so, will we have to still do the online training.

Yes, in Phase 2 you may receive credit for certain topics presented at conferences. There may however be additional online training requirements you will need to complete. Additional details for Phase 2 will be available prior to August 1, 2019.

4. Do all certifying officials listed on the 22-8794 are required to take the training if we have only one person designated to certify our students?

The 22-8794 is being remodified to identify individuals with read only or inquiry only access. If an individual is designated as read only or inquiry only, he/she will not be required to take the training. More importantly, if an individual is designated as read only or inquiry only, he/she will not be authorized to submit certifications to VA.

5. What if we teeter on the 20 student enrollment. Some years we have 18 VA students and other years we have 20+ VA students. Are we required to do the required SCO Training?

Section 305 of Colmery mandates training for institutions with 20 or more students. A covered institution is one with 20 or more individuals who received benefits during the year. Requirements will be based on enrollment during the previous year. (i.e., Requirements for new SCOs designated on or after August 1, 2018, will be based on the number of VA students enrolled in 2017.)

6. If a school does not have 20 VA students at the beginning of an academic year but picks up more later (transfer in, or student becomes eligible), how much time does the SCOs have to get the training? Will VA certification have to be put on hold until the training is

A covered institution is one with 20 or more individuals who received benefits during the year. Requirements will be based on enrollment during the previous year. (i.e., Requirements for new SCOs designated on or after August 1, 2018, will be based on the



number of VA students enrolled in 2017.)

7. Is there a process for when a SCO changes their name?

Contact our Education Liaison Representative (ELR) of Jurisdiction for updates to your name.

8. I receive notices to complete the SCO training and I have already completed it when I initially became a SCO?

The effective date for implementation of this section is August 1, 2018. The first phase will establish requirements for new SCOs designated on or after August 1, 2018.

9. Have we been told how many hours of training must be completed each year?

Phase 1 training for new SCOs is approximately 5 hours. WE have not finalized training requirements for existing SCOs under Phase 2. However, the number of hours may vary from year to year depending on the training topics.

10. Are you saying all SCOs need to do the training? Or, only new SCOs?

The effective date for implementation of this section is August 1, 2018. The first phase will establish requirements for new SCOs designated on or after the implementation date. Training requirements will need to be met on or after this date. Phase 2 is effective August 1, 2019, and applies to existing SCOs.

11. How will the SCO training requirements be tracked by the VA?

The online training will be tracked by VA. During Phase 2, in person training will be tracked through registration and completion of a training assessment.

12. We have fewer than 20 students using VA educational assistance. It sounds like we do not meet the criteria for a "covered educational Institution". What does this mean?

Section 305 of Colmery mandates training for institutions with 20 or more students, however, the training will be available online for anyone who wishes to complete it.

13. Will we get a certificate for attending today?

Certificates are not available for existing training or webinars.

14. On slide 25, where can we find the list of covered institutions?

The list of covered institutions schools will be generated annually and may change depending on the number of VA students enrolled, and identified on the GI Bill Website under School Resources.



15. so right now the SCO and Asst SCO is designated on VA Form 22-8794 and VA is ONLY LOOKING at work study or other key person designation at a LATER time, possibly?

Proposed revisions to VA Form 22-8794 allow for designation of individuals with “read only” access to VA information. Individuals designated for “read only” and/or Work-study students may access online training and are not subject to training requirements. However, they may not submit information to certify, amend or adjust a student’s enrollment.

16. Can an "experienced" SCO take the modules designated for "new" SCOs when they are available?

Yes. The first phase of training for new SCOs will be available by August 1, 2018. Training is required for individuals at covered institutions, however, the training will be available online for anyone who wishes to complete it.



## Outcome Measures-

1. Is there a guide on format/where the student completion/graduation data should be getting sent to for Public Law 114-315 Section 404?

The VA Once (VA Online Certification of Enrollment) System and VA Form 22- 1999b "Notice of Change in Student Status" are used to report graduations and/or completions of the educational program. Please refer to the SCO handbook (Page 81) for more information regarding reporting graduations and/or completions. VA Form 22- 1999b "Notice of Change in Student Status" for changes in enrollment status, which includes graduations/completions. Please see the SCO handbook for procedures for submitting student enrollment information.

2. How do we report graduation and completion rates?

The VA Once (VA Online Certification of Enrollment) System and VA Form 22- 1999b "Notice of Change in Student Status" are used to report graduations and/or completions of the educational program. Please refer to the SCO handbook (Page 81) for more information regarding reporting graduations and/or completions. VA Form 22- 1999b "Notice of Change in Student Status" for changes in enrollment status, which includes graduations/completions.

3. Do we still report graduation only for students who were certified for the term in which they graduate?

We need graduation information for students that graduate/complete an educational program during the certified term while using VA Educational Benefit.

4. If not completed for prior students are we to go back and report? re: academic Progress, graduation reporting etc.

The notification letter regarding Public Law 114-315 Section 404 "Academic Progress" indicates the timeframe regarding when to report the data. Institutions have until January 1, 2019 to comply with providing VA with academic progress data beginning January 1, 2018 and thereafter. However, we do request that institutions go back three years or as far back as August 1, 2009, so that we have a more robust set of graduation data; the requirement to report begins from January 1, 2008 thereafter.

5. How will we report graduation for students who graduate while not using VA benefits?

If a student did not graduate using VA benefits i.e., they exhausted their benefits, that data (reason for termination: benefit exhausted) is collected in the BDN master record and LTS, as well. Graduating after entitlement has been exhausted, typically, requires no action from the processor since the action is after the benefit exhausted. We are currently exploring this as a potential data element to collect or receive.



6. I'm new, so if a student exhaust their entitlement should we still report graduation?  
You have the option to submit graduation/completion data for students that have exhausted their Chapter 33 VA Educational Benefit through one semester/term. We are currently exploring tracking student matriculation post benefit exhaustion.

7. Who is responsible for reporting academic progress and outcomes? Will that be the SCO or the institution's Institutional Research branch?

According the SCO handbook, SCO's and/or the designated official for the educational institution is responsible for reporting educational data either via VA Once or the submission of VA Form 22-1999/1999b.

8. For academic progress, is this referring to terminating claims in VA Once when a student has graduated?

No, academic progress is larger than terminating claims. The expectation is to collect data to better inform veterans and beneficiaries in their decision making regarding benefit use, and to better inform them of the opportunities to enhance the delivery of the Chapter 33 benefit. In addition, this helps them to understand the results of the overall population. Terminating a claim, should follow standard VA processing rules; academic progress does not alter any existing requirement.

9. For Graduation, we've been directed that we can only report that through VA-Once if the student's using their education benefits during that same semester. This causes issues with reflecting correct grad numbers.

Please provide the directive/guidance given. If that's unavailable, please identify the EDU leader so additional discussion clarification can be provided.

10. You can't report Graduation data if they are not using the GI Bill at that time. Wont this make the numbers incomplete?

Public Law 114-315 Section 404 and Outcome Measure Data is only for beneficiaries that used the VA Education Benefit at the time of graduation/completion. We are currently exploring other measures and options regarding graduations/completions of beneficiaries using other VA Educational Benefits.

11. Are outcome measures being collected for graduate schools at this time? We were told it was for undergrad only.

No. Graduate school graduation/completion is not part of the calculation.

12. Not sure what the difference between graduation and completion is...can you explain?

Completion is when a beneficiary completes an educational program at a 4- year, 2- year, and/or Non-College Degree Educational Institution. A graduation is a completion, but completion encompasses other forms of educational program achievements.



13. I've been reporting graduations for the last several years. Did something else change or is this just enforcement of the original requirement?

Congress passed Public Law 114-315, the section 404 of the public law now makes reporting graduations/completions mandatory. Going forward, this will be a requirement, whereas before, it was not required.

14. How can we get more information on reporting SAP and outcome measures?

A notification letter will be sent explaining Student Academic Progress and outcome measures. Also, a section in the SCO handbook has been drafted and is pending inclusion. Finally, a new section to the M22-4 is being drafted.

15. What is the difference between graduation and completion data?

Completion is when a beneficiary completes an educational program at a 4- year, 2- year, and/or Non-College Degree Educational Institution. A graduation is a completion but completion encompasses other forms of educational program achievements.

16. Has it been updated to include graduation reporting of all benefit chapters?

Public Law 114-315 Section 404 only requires data for students using VA Chapter 33 Educational Benefits and Outcome Measures are only for Veteran's using VA Chapter 33 Educational Benefits. Outcome Measures including Graduations/Completions for other VA Educational Benefits is currently under review, however only Chapter 33 data is mandatory by law at this time.

17. On one of the slides (42) for the requirement of schools having to report outcome measures, it stated that schools are going to be required to report grades and progress of students "using education assistance through Chapter 36". Was this a typo? How are schools supposed to track or know what students are utilizing Chapter 36 services? Was it supposed to be Chapter 33 or Chapter 35?

The reference is taken directly form Public Law 114-315 Section 404. Chapter 36 refers to 38 U.S. Code Chapter 36 - Administration of Educational Benefits.

18. What is Chapter 36?

Chapter 36 refers to 38 U.S. Code Chapter 36 - Administration of Educational Benefits.

19. For SAP, do we have to review completion rate like in Title IV and GPA or is VA doing this based on how we do our normal updates in VAONCE for end of term reporting?

We are doing this based on how School Certifying Officials update enrollments in VA Once and/or with the submission of a VA Form 22-1999/1999b. These updates are then used in the Outcome Measure data.



20. Are we to be reporting now?

The notification letter regarding Public Law 114-315 Section 404 "Academic Progress" indicates the timeframe regarding when to report the data. Institutions have until January 1, 2019 to comply with providing VA with academic progress data beginning January 1, 2018 and thereafter.

21. If a student does not attend at a rate of 100% at a clock hr. school, the VA end of term date will occur prior to the grad date. How will clock hour schools report when a student graduates?

Please report the graduation/completion during the term in which the student graduates using the VA Education Benefit.

22. With the SAP are you going to be following the DOE guidelines or the institutional guidelines from the registrar?

We are currently utilizing Department of Education 34 CFR 668.34 "Satisfactory Academic Progress" as a baseline for the Department of Veterans Affairs Academic Progress measurements. However, the Department of Veterans Affairs Education Service is using the Outcome Measure requirements to measure academic progress but we are exploring other measurements.

23. Will you need to measure transfer students or only new students?

We do track students using Chapter 33 benefits that transfer to another Educational Institution. However, a student that transfers at the IPEDS level prior to their effective date of graduation are not counted in the graduation rate calculation.

24. If an Associate degree in Paramedic is reported on VAONCE for a veteran, but the veteran completes a Technical Certificate in Paramedic (all classes are required within the Associate degree) and chooses not to keep pursuing the Associate degree, can the Technical Certificate be reported as completed even though the Associate degree in VAONCE was not completed?

The Veteran needs to complete an educational program as defined in 38 U.S. Code 3452. If the criteria are met and the Veteran completed an educational program resulting in a degree and/or a certification while using Chapter 33 benefits that graduation/completion needs to be reported. This graduation/completion data while using the Chapter 33 benefit is now required by law. (PL 114-315 section 404)

25. The state of NH is currently without a State Approving Agent, will you work with our ELR instead?

We will work with the State Approving Agent (SAA) when applicable and the next appropriate representative if a SAA is unavailable.





## Debt Management Center-

1. I am curious as to why it is necessary for the Debt Center to send a letter then an invoice?

The RPO sends a detailed letter explaining the changes in benefit eligibility. DMC sends the first notice of indebtedness (NOI) with the payment coupon approximately 2-10 days later

2. Why can't it be done all in one letter?

DMC and VBA are currently investigating this.

3. Why would they send both the 1st and 2nd NOI at the 30-day mark?

The first DMC letter or 1<sup>st</sup> NOI is sent 2-10 days after debt is created by RPO. The 2<sup>nd</sup> NOI is sent 30 days after the 1<sup>st</sup> NOI (unless a dispute is received; which delays the next letter until after the dispute is resolved).

4. Are there any plans to offer self-service options for schools to check for electronic payments or to check to see if returns to the DMC have been processed?

We are currently working with OIT to create a self-service portal for Veterans. At this time, we are unsure how schools will be impacted by this effort.

5. Slide 39: Please repeat items to include on the inquiry/dispute.

Items to include when submitting a dispute:  
Student's first name, middle initial, last name  
Last 4 digits of student's SSN or file #  
School name and facility code  
Debt amount disputing  
Detailed explanation of dispute

6. Can we send uncashed checks to the DMC from chapter 31 benefits?

No, DMC does not deal with Chapter 31 benefits paid to schools. Please contact the RO for instructions on how to return those payments.

7. How would a school make sure the DMC has the correct mailing address for debt letters?

DMC debt letters are sent to the address on record in WEAMS. Please work with the SAA and ELR to ensure the correct address is listed in WEAMS.



8. Please repeat detail of information to be included in a Debt Management inquiry. (were mentioned but not printed in the slides)

Items to include when submitting a dispute:  
Student's first name, middle initial, last name  
Last 4 digits of student's SSN or file #  
School name and facility code  
Debt amount disputing  
Detailed explanation of dispute

9. Will the debt management center ever have an "SCO hotline" like the education benefits side does? It is really helpful!

Thank you for the feedback – we will take this idea into consideration.

10. Can you pay DMC thru ACH return payment if you are not returning the full payment for a student (i.e., student's fees changed)?

No, the ACH return payment only allows the school to return the full payment.

11. I am wanting to bring up the issue that you receive a debt letter for a debt for an enrollment period. Time starts ticking as to when the payment must be paid before it goes to the treasury. The issue is if when a separate debt is created, the time doesn't start over for the new debt. It is added to original debt and much less time is given to make the payment. I would like to see each debt to have their own timeline. We have had to rush payments because we went right to the last debt letter notice giving 60 days to make payment on a new debt just created.

We understand the challenge this can cause for schools and can work with schools individually if they contact us before referral via email. VA's future financial management system is being upgraded to facilitate individual debt referrals to TOP rather than an aggregate amount.

12. For Debt Letters is it possible to send the letters to the Certifying Officer? We sometimes have difficulty with delayed communication as we work at a large University and the letters are sent to the University, not a specific department of contact person.

DMC debt letters are sent to the address on record in WEAMS. Please work with the SAA and ELR to ensure the correct address is listed in WEAMS.



13. Our auditors are wanting us to show proof of student debt instead of college debt. Is there a way to receive the student debt letter and not just the college debt letter? sorry, with College debt. The auditors would like to see both debt letters Students and College.

Due to student privacy, we are unable to provide student debt information to the schools.

14. What can SCOs do with overpayments that need to be refunded to the student if the SCO or the school is unable to reach the student to receive the refund? Funds are returned to VA but is sent back to the school because there is no active debt on the student to apply the returned funds. This specifically applies for students who were charged tuition and fee debts when they were intended for the school.

In some cases, DMC can apply funds to student debts if the school requests and a debt balance exists. Otherwise, DMC is unable to assist.

15. Is there anything in the works for this situation? A military member transfers entitlement to a dependent, but doesn't meet obligation date. Debt Management charges the student the debt, should the debt be charged to the veteran?

The law is specific that TOE debts are owed by both the Veteran and the dependent. Current procedure is to create the debt under the dependent's SSN, system limitations prevent DMC from collecting from both parties concurrently. VA's future financial management system is being upgraded to facilitate this type of collection.

16. I'm sorry. Why would someone who passes owe a debt? Shouldn't it be forgiven?

Unable to answer without additional context.

17. For DMC - If a debt has been referred to TOP when will it fall off the school's debt report?

A debt will remain on a school's debt list until it has been paid in full. It can take 2-3 weeks between when the TOP offset occurs and when funds are transferred to DMC to apply.



## VA-ONCE Questions

1. Hello, will correspondence training be able to be certified via VA Once at some point?

Yes, but we do not have a definitive timeline.



## General

1. \$1000.00. Then amended this to \$600.00. Shouldn't the debt be placed on the student as it was after an adjustment was reported?

If the adjustment is to tuition and fees with no change in hours or term length, then it is a school debt. Please refer to "Chapter 33 Fiscal Issues" in the SCO Handbook.

2. Do they touch more on dual certifications in the handbook?

Additional information is provided in the current edition of the SCO handbook on page 45 under "Chapter 33 Enrollment Certifications."

3. VA audit, how to prepare? and requirements

The SCO Handbook covers Compliance Surveys, what is reviewed, and common issues. For further explanation or clarity, please contact your ELR.

4. What's the CAP for 2018-2019?

The payment rates for the 2018 Academic Year (August 1, 2018- July 31, 2019) can be found at

[https://www.benefits.va.gov/GIBILL/resources/benefits\\_resources/rate\\_tables.asp#ch33](https://www.benefits.va.gov/GIBILL/resources/benefits_resources/rate_tables.asp#ch33)

5. Where can we find previous SCO Handbook versions

Archived versions of the SCO Handbook can be found in [KnowVA. Article ID: 554400000058573](#).

6. What about using Student Clearing House?

Student Clearing House is a 3rd party vendor and we (VBA Education Service) would have to enter into a contract with Student Clearing House in order to utilize their services. VBA Education Service has worked with Student Clearing House in the past and we are currently exploring future options with vendors.

7. Can you explain the point behind having to submit the original T/F amount if a change has taken place in enrollment, given that student debt is based on a school's overpayment?

The VA has different payment rules that may allow us to pay for days/hrs./credits which a Facility would not. As such, the VA requires the original tuition/fees and credit hours prior to a reduction.

8. I am new to this ... where would one get or find the SCO handbook?

[https://www.benefits.va.gov/GIBILL/docs/job\\_aids/SCO\\_Handbook.pdf](https://www.benefits.va.gov/GIBILL/docs/job_aids/SCO_Handbook.pdf)



9. Good Afternoon, currently to submit for class/program approval through a state approving agency the VA policy requires the physical submission (or CD copy) of two academic catalogs (38 CFR 21.4252). Currently, many schools now use an electronic academic catalog that is available through the institution's website and a physical academic catalog is considered obsolete and no longer printed or maintained. My state ELR instructed that there is no work-around for this and that the submission of a physical/CD copy of the academic catalog is still required. The amount of time that would be required for me to produce this on my own for a "check in the box" is significant and not a practical answer as I do not have the time to complete this task. Has the VA addressed or updated this policy to stay current with the academic institutions? If not, is it something that will soon to be addressed or updated to account for electronic academic catalogs and policies?

Submitting a catalog is a requirement by law. 38 U.S. Code § 3675 – the statute for accredited program approval, states that "An educational institution shall submit an application for approval of courses to the appropriate State approving agency. In making application for approval, the institution (other than an elementary school or secondary school) shall transmit to the State approving agency copies of its catalog or bulletin which must be certified as true and correct in content and policy by an authorized representative of the institution."

38 USC 3672(b)(2)(a) cites that standard college degrees in public and not-for-profit institutions of higher learning are deemed approved providing specific statutory requirements are met. If a public or not-for profit institution of higher learning had no non-college degrees, and no certificate programs, a catalog was not required. VA's General Counsel subsequently provided guidance that someone must determine that the programs meet the deemed approved statutory requirements. VA provided guidance to the State Approving Agencies on July 28, 2016 and requested the SAAs review the programs that were deemed approved and requested the SAAs ensure the specific statutory criteria required was met. Public Law 114-315, Section 408, signed on December 16, 2016, amends 38 USC 3672 and clarifies the role of the State Approving Agencies for the approval of programs outlined in 38 USC 3672.

Web-based catalogs are not acceptable because they can be easily changed without notice to the VA or SAA. Thumb drives are not acceptable, because they cannot be plugged into VA systems. If the school utilizes a web-based catalog, they must print a copy or move a copy to CD in pdf format, so that the SAA and VA can see a specific point in time for the programs and policies that are outlined. Before you put the catalog on a CD, contact the SAA of your state to determine their policies and procedures for accepting a CD. As stated above, schools must certify a copy is true and correct.



10. I wish you would differentiate "never attended" vs. abandoned.

For 75B debts "Never attended" refers to non-attendance. Abandoned implies once having attended. If the student withdraws on or before the first day of the term, then it's considered non-attendance and a 75B.

11. Has the VA made a decision on ACICS institutions eligibility past June 11th? with the new decisions are we able to continue certifying students?

Based on March 23, 2018, Memorandum Opinion, all ACICS activity should resume as if the Department of Education revocation never occurred. However, if your program is no longer accredited by ACICS and has not obtained accreditation from another accrediting agency recognized by the Secretary of Education, you cannot certify.

12. Will SCOs designated as "Read Only" be able to get specific information and questions answered by calling the SCO Hotline?

Yes. They will be able to contact the Call Center and request information about a student (i.e., payee number, benefit level, remaining entitlement), however, he/she cannot certify enrollments or report information to VA which could be used to amend or adjust an award. Additionally, he/she is not subject to the training requirements.

13. How many times can a student repeat the same course and still receive benefits from VA?

Generally, a course successfully completed may not be recertified again to VA. There are two exceptions. First, if a student fails a course or receives a grade where the program requires a higher grade than the one received, that course class may be repeated and certified to VA again for payment. Courses repeatedly failed can result in a student not meeting the school's academic progress standards. The school would then follow their academic progress standards and suspend or terminate the student accordingly.

The second exception is when the student is in their last term and enrolls in additional hours to increase their training time or rate of pursuit. Students may be recertified in a course that has previously been successfully completed to round out their schedule up to fulltime status. Rounding out a schedule can be done only once per program and must be the student's final term.



14. For those who choose to use Post 9/11 instead of Montgomery GI Bill, are they able to get the money back from what they paid into for the Montgomery GI Bill?

An individual who made an irrevocable election from the Montgomery GI Bill (CH 30) to receive benefits under Post- 9/11 GI Bill (CH 33), will receive a refund of their CH 30 contributions of up to \$1200.00 if entitlement is exhausted under CH 33.

15. How can our learning organization register as a VA Course Codes – Non-College Degree at Institutions of Higher Learning (NAI).

There is not enough detail provided to adequately address this question. It is not clear if the institution is an IHL or NCD but does sound like they are seeking guidance on how to code programs in VA-Once. NCD Codes to be used at IHLs can be found in the SCO Handbook on page 120. Additional assistance with VA- Once can be provided your ELR. You can find your ELR by following the link below.

[https://www.benefits.va.gov/GIBILL/resources/education\\_resources/school\\_certifying\\_officials/elr.asp](https://www.benefits.va.gov/GIBILL/resources/education_resources/school_certifying_officials/elr.asp)

