Forever GI Bill Stakeholder Focus Groups

Questions and Answers

Please note: This document has been updated as of September 20, 2019, and replaces the FAQs released as of June 2019.

We are working to update our IT systems to pay Veterans in compliance with the requirements of Sections 107 and 501 of the Harry W. Colmery Veterans Educational Assistance Act. The “Go-Live date” for our IT System is set for December 1, 2019. The “Go-Live” will implement Sections 107 and 501 to ensure that Spring 2020 enrollments will be processed according to the Colmery Act. Following the “Go-Live”, students impacted by Sections 107 and 501 will be informed via letters on changes to their monthly housing allowance. As we prepare for these changes, we will update you with answers to the questions you are asking. We’ll continue the conversation in these questions and answers and will continue to send you more information as available. If you have additional questions, please contact us at ForeverGiBill.VBAVACO@va.gov and a VA representative will be in touch.

Questions and Answers

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Retroactive Payments

1. **What should students expect in terms of receiving information on overpayments or underpayments due to the December 1, 2019 implementation of Sections 107 and 501?**
   - All students who received a monthly housing allowance (MHA) on or after August 1, 2018 will have their accounts reviewed and updated in accordance with Sections 107 and 501. For students who were underpaid, we will notify students via letter if they are going to receive a supplemental payment and when to expect the payment after December 1. For students who were overpaid, VA will automatically review the claim for waiver of the debt and provide additional information on this process.
   - For Section 107, VA is using the Focus Groups to gather additional information from schools and other stakeholders on how to best address affected terms (between August 1, 2018 and December 1, 2019). We will be looking for your input to develop an orderly and efficient plan and expect to share late Summer 2019.

2. **Will there be any tax burden on students?**
   - No. VA education benefits remain tax exempt.

3. **Will students have to apply or appeal to receive their corrected payments?**
   - No. Students will not have to apply or appeal for corrected payments.

Recertifying Enrollments

4. **Will schools have to recertify all students?**
   - No. Schools will only have to recertify students that are not taking all their classes at the main or branch campus location. Schools with extension campuses will have to recertify students who attended classes at that extension campus prior to December 1, 2019. VA will issue additional guidance on when this recertification will occur.

5. **Will future enrollments need to be held?**
   - No. Schools should continue to submit enrollments. VA does not expect schools to hold future enrollments.

6. **If there are multiple extensions in the same zip code, will schools need to report the sites separately?**
   - Yes, these extension campuses will need to be submitted separately.

7. **If the extension campus is in the same zip code as the main campus, do schools need to resubmit?**
   - No. Schools will not have to resubmit enrollments in these circumstances. For example, a student took a course at the main campus (facility code: 11111111) and is now taking a course at an extension campus (sub-facility code: 11X11111). The student’s enrollment was originally certified at the main campus only. The extension campus is in the same zip code as the main campus. No further action is required. Terms prior to December 1, 2019 will not need to be recertified. VA will be providing additional details on this process in the future.

8. **If all school campuses receive the same MHA rate, would it be possible to receive a waiver to re-certify students for no change in a payment to the student?**
   - VA will work with individual schools to address their concerns including how best to proceed in terms of workload and timeline for retroactive enrollments. Section 107 requires that students
be paid the monthly housing allowance of the location where they physically attend the majority of classes.

9. How will schools recertify enrollments, and will this impact all previously processed enrollments?
   - We are exploring how to address this and encourage schools to help us determine the best approach. Please send your recommended approach to FOREVERGIBILL.VBAVACO@va.gov. We will also seek additional input on recertifying enrollments during roundtables and focus groups throughout the fall of 2019.

10. Should schools hold enrollments leading up to system go-live on December 1?
    - We will not ask schools to hold enrollments and will continue to provide updates on the implementation as December 1 approaches.

11. What is the deadline for schools to recertify?
    - We understand that the recertification process will take time and will be implementing a phased approach to recertify students. We will be providing more information on the planned recertification process over the next few months. In the meantime, we invite stakeholders to continue to join upcoming discussions to help us develop a plan that best meets your needs. Please send any recommended approaches to FOREVERGIBILL.VBAVACO@va.gov to help determine the best way forward.

12. How is VA taking into consideration schools with large Veteran populations?
    - We are exploring ways to address recertification of enrollments and to determine a path forward with the least impact to schools and Veterans. We encourage schools to help us determine the best approach. Please send your recommended approach to FOREVERGIBILL.VBAVACO@va.gov.

13. Do schools need to track all Veterans impacted by Section 107?
    - Yes. We are asking schools to track all students who physically participated in classes at multiple campuses, including extension campuses. Section 107 requires that students be paid the housing rate of the location where they physically attend the majority of classes. To accurately account for those enrollments and to reimburse claimants who have been underpaid, we need schools to track and resubmit enrollments at locations that the student physically attended. VA will work with individual schools who have multiple campuses in the same zip code or MHA rate.

14. What are recommendations to begin tracking Veterans impacted by Section 107?
    - We recommend schools track students and what campuses they physically attend courses. Data fields to track—include start date, credit hour, full time modifier, and any adjustments and amendments (such as dropping or adding classes) at an extension vs. main or branch campus.

15. Will Section 107 impact graduate non-standard terms?
    - No. Section 107 implementation will not impact graduate non-standard terms.

16. Will Section 107 or recertification of enrollment impact the calculation for the rate of pursuit?
    - No. The rate of pursuit calculations will not change.

17. Will recertification of students impact the annual reporting fee?
    - No. VA does not count duplicate enrollments, so the annual reporting fee will not be impacted.

18. How will we recertify a previous certification that has been terminated?
• VA is currently exploring how to “reopen” a terminated term. More information will be shared when the guidance is released on the recertification effort.

19. How do we certify terms at our extension campuses that begin prior to December 1, 2019?
• Any courses or terms starting before December 1, 2019, that are being taken at an extension campus should be certified at a main or branch location.

20. How does Section 107 work with a community college with a flight program. Student has to go over to a center to complete flying time. Is that considered classroom activity, or should it be treated like an internship/practicum.
• Flight training is a form of instructor-led residence training. Regarding section 107, it shall be applied in the same manner as any other type of instructor-led residence training. Flight training required as part of a degree program will not be considered a practical training course (e.g., internship, practicum). Practical training (other than that associated with medical, dental, and nursing fields) is described in 38 CFR 21.4265(f) as “other off-campus job experience.” Flight training is not a form of “job experience;” therefore, it is not a form of practical training.

21. How are clinicals, student teaching, independent study and study abroad impacted?
• Off-campus training MHA (including internships, practicums, externships, clinical rotations, and residencies) will be paid based on the location of the campus where the student is enrolled, as long as the “off-campus training site” does not meet VA’s campus definition requirements. VA will release additional guidance soon regarding study abroad. Generally, if the student is attending a foreign institution or a campus in a foreign land for a domestic school, that student will be paid based on the foreign rate.

August Extension Campus Upload

22. Will SAAs let schools know if their clinical location is considered an extension campus?
• VA encourages SCOs to work with their SAAs to determine whether specific locations meet the requirements to become approved extension campuses. VA provides overarching guidance on the definition of an extension campus. However, states may have their own individual guidance on how they define an extension campus. Any extension campus submitted to VA must meet VA requirements and be approved by the SAA.

23. Are schools required to identify these extension campuses or is it at the discretion of the school?
• Yes. Schools should first identify extension campuses that currently have GI Bill beneficiaries attending, and work through their state-specific processes to get these locations approved. Schools should be aware of both the VA guidance for extension campuses and any state-specific requirements

24. How will out-of-state extension sites be handled for extension campuses?
25. An extension campus must have a branch or a main campus within the same state to associate it with. For any campus located in a different state, SCOs must coordinate with the SAAs for each State to validate if the location can be approved for GI Bill benefits. Extension campuses cannot be approved across state lines if there is not an approved main or branch campus in that state to associate the extension campus with. If a campus is located across state lines and it is the
only campus in that particular state, it cannot be approved as an extension campus. It will need to be approved as a branch campus.

26. What if the extension campuses are not all updated or submitted by the September 30, 2019 deadline?
   • On August 5, VA systems were updated to include all previously collected and approved extension campuses within VA records. Any missing extension campuses must be approved and submitted to VA by September 30, 2019, to be included in the December 1 implementation. If any extension campuses are not submitted by this deadline, SAAs will need to work with their ELRs to have these campuses manually updated.

27. Where do we find paperwork to add an Extension site?
   • Please contact the SAA of jurisdiction regarding documentation concerns, as each SAA may have different requirements.

28. Will the Extension Campus batch upload generate multiple extension campuses with the same number?
   • No, the system will prevent duplicate extension campus sub-facility codes.

29. Who adds the extension facility codes to VA-ONCE?
   • Schools submit campuses for approval to their SAA and the SAA works with their VA ELR to have the campus added (for new campuses) or updated (for changes to existing campuses).

30. How will overseas campuses of US schools be handled? What about schools that are located on an international border that may have extension campuses located in another country (e.g. Vancouver)?
   • US-owned schools that have a teaching site/extension campus located in a Foreign country can be approved by the SAA of jurisdiction. The foreign housing rate is the national average MHA rate. If a student is taking a distance education course from campus located in a foreign country, the foreign housing rate is half the national average MHA rate.

31. What if none of our SCOs received the email from VA that listed the known extension campuses?
   • If you did not receive an email with the extension campus data, it means that VA does not currently have any approved extension campuses on file for your school.

32. How do you know what extension campus is assigned to what sub-facility code?
   • Your ELR can generate a report from WEAMS showing the extension campus location/address and which sub-facility codes they are aligned to. You can also view the sub-facility code for an extension campus in VA-ONCE. You can also check the GI Bill Comparison Tool.

33. I do not see any extension campus sub-facility codes in VA ONCE. What do I do?
   • Please contact your SAA of jurisdiction to determine if they are aware of your extension campuses, and if they are providing these to VA. If not, the SAA will provide further instruction on the approval process.
34. How do you divide up the Tuition and Fee charges if it is a flat rate tuition charge for students who take courses at the main campus and an extension campus?
• Schools that charge flat rate tuition must also report the net tuition and fees. When a student is enrolled in modular terms (i.e. mini sessions within the standard term), the net tuition and fees should be associated and reported with the first credits that total the minimum number of credits required to be a full-time student at the school. Please see ‘Certifying Tuition and Fees’ section of the SCO handbook for examples of how to accurately certify net charges for modular terms at schools with flat rate tuition.

35. If you have a student that decides to transfer campuses in the middle of a 1500-hour course, do you have to enter tuition and fees as entered initially or do you need to prorate for the hours taken at the new campus?
• Based on this clock hour program scenario, the tuition and fees would need to be prorated, and prior credit provided. This would ensure that any change in MHA is processed correctly, and in case of a withdrawal, the correct debts would be created.

36. How do these changes impact the parent-guest relationship?
• VA is currently reviewing the impact to parent/guest student relationships to determine if changes are needed to the process. VA will release additional information as it becomes available.

37. What changes should schools who process enrollments on paper be aware of?
• All changes listed in prior FAQs still apply to paper enrollments.

Zip Codes and Facility Codes
38. What is the difference between a branch and extension campus?
• The key difference between an extension and branch campus is the presence of administrative capability. A main/branch campus would have administrative capability whereas an extension campus would not and would be located in a different geographic location. Definitions of main, branch, and extension campus are as follows:
  o Main Campus: A location where the primary teaching facilities of an educational institution are located.
  o Branch Campus: A location of an educational institution that (i) is geographically apart from and operationally independent of the main campus of the educational institution; (ii) has its own faculty, administration and supervisory organization; and (iii) offers courses in education programs leading to a degree, certificate, or other recognized education credential.
  o Extension Campus: A location of an educational institution that is geographically apart from and is operationally dependent on the main campus or a branch campus of the educational institution.

39. What does “administrative support” or “administrative capability” mean?
• Administrative capability means the ability to maintain all records and accounts that 38 C.F.R § 21.4266(a)(3)-(5) requires.

40. Will schools have to enter multiple zip codes for main, branch and extension campuses?
• No. Schools will not need to enter zip codes in VA-ONCE. Instead, we will be using facility codes and sub-facility codes for campuses. Each campus will have a unique facility code/sub-facility
code. These codes will allow the VA to pay students the housing based on the location where the student physically attends classes.

41. If the campus has an extension, how will that be displayed in the sub-facility code?
   • The third, fourth, fifth and sixth digits of the facility code are changing to create the new sub-facility code. The system will prevent duplicate sub-facility codes from being created. The third digit will be an ‘X’, and the fourth, fifth and sixth digits will be assigned by the system in sequential order from 001 – 999. All other remaining digits will remain the same.
   • For example,
     i. 11X01138 (first extension campus identified)
     ii. 11X02138 (second extension campus identified)
     iii. 11X101138 (101st extension campus identified)

42. What happens if we exceed the number of digits available in the sub-facility code?
   • The VA is conducting an internal analysis to identify what happens if the maximum number of sub-facility codes is exceeded.

43. We currently have branch campuses without assigned facility codes for some schools. Will these also be considered extension sites for this purpose or will we need to assign a new facility code?
   • Please contact your SAA. It is solely left to the SAA, in their adjudicatory authority and discretion, to determine, as a preliminary factual matter, whether a school’s proposed training location is one that constitutes a “campus” of the educational institution. The SAA will determine if the campus is main, branch or extension.

44. Do schools need to calculate if the student has completed a "majority" of their training in an alternate zip code?
   • No. Schools do not determine the majority of where classes are taken. Rather, schools are expected to submit enrollments with the appropriate facility or sub facility code based on whether the location is a main, branch, or extension campus. Each extension campus will have its own sub-facility code, which will map to the zip code of the extension facility location. That information info will be stored in WEAMS and VA-ONCE.

45. Will schools have to request another or new facility code for an extension campus?
   • As part of the approval package schools submit to their State Approving Agency (SAA) they should already have submitted any extension campuses. VA is currently reviewing its records to compile a list of extension campuses to make available within its systems. Once this process is complete, VA will work with schools to verify extension campuses. If there are any extension campuses that were not identified, schools will have to submit these locations to SAAs for review and approval using existing procedures.

46. If a school receives new facility codes for our other training sites, will we need to submit additional designation of certifying official forms?
   • The addition of an extension campus alone does not require a new certifying official form to be completed. All certifying officials at the main or branch campus will have access to the extension facility code. VA Form 22-8794 should be completed when a new certifying official is added or certifying official information changes.
47. In the original Forever GI Bill implementation instructions to schools, schools had to have all zip codes listed in the catalog. Is that still the case?  
- Extension campuses will need to be listed in catalogs.

48. Will distance learning be impacted?  
- Solely distance learning will not be impacted by these changes. The Forever GI Bill did not change MHA calculations for these programs. Therefore, MHA for individuals enrolled in these programs will be paid as they are now at half of the national average. Solely distance courses will continue to be certified as distance hours at the main or branch campus.

49. What rate will be paid if there is no majority of classes (e.g., a student takes 6 undergraduate credits at a main campus and 6 credits at an extension campus in a single semester)?  
- If there is no majority, then the student will be paid the MHA rate that is most advantageous to the student.

50. What rate will be paid if a student takes the majority of classes at an online location (e.g., what if a student’s takes 3 course units at a main campus, while taking 9 course units of online courses)?  
- VA will pay the rate for the residential (in this scenario, main campus) facility.

51. How will VA develop facility codes for schools at domestic and foreign military bases?  
- Domestic bases will be treated as a campus extension facility. Foreign military bases will be based on the foreign monthly housing allowance rate (national average).

52. Do students usually know if they are at the main campus or at the branch location?  
- Schools will need provide guidance to students as to whether they are attending a main, branch, or extension campus. Students are also encouraged to use the GI Bill Comparison Tool where they can enter the campus location zip code to find their MHA rate.

53. Will the GI Bill Comparison Tool be updated as well with new facility and sub-facility codes?  
- Yes. We are working to update the GI Bill Comparison Tool with extension campus data and VA will communicate with schools and students when ready. Currently, Students can input the zip code of their campus location on the Comparison Tool to see their housing rates.

54. Will the GI Bill Comparison Tool updates be marked as "updated information" or will the updates just appear one day?  
- The GI Bill Comparison Tool will not mark updates as “updated information”. However, there will be ongoing communication leading up to the GI Bill Comparison Tool facility and sub-facility code updates.

55. Main and Branch campuses often share extension sites. Is it correct to assume that these extension sites must be provided for each distinct Facility Code?  
- Yes, each main or branch campus will have a distinct sub-facility code assigned for each extension campus. The school certifying official will have access to the sub-facility code within VA-ONCE.

56. Where do we see the sub facility codes WEAMS or VA-ONCE?  
- You will be able to see them on both the 22-1998 report received from your ELR and in VA-ONE. In VA-ONCE the extensions will be included in the drop-down on the Select Student page.
and in the drop-down when adding a student. Extension campuses are also visible in WEAMS Public and the GI Bill Comparison tool.

57. If you add a student to an extension campus in VA-ONCE for the fall term, do we have to add them when we certify their enrollment for the spring term?

- Adding the student to an extension campus is the same procedure as adding the student to the main facility code. You only need to add a student once. Students can be added to an extension campus at any time, however, SCOs can only certify enrollments using extension campuses for terms beginning on or after December 1, 2019.

58. Will students in clinical rotations at an off-campus location need to be recertified? Is a hospital considered an extension campus?

- Off-campus training MHA (including internships, practicums, externships, clinical rotations, and residencies) will be paid based on the location of the campus where the student is enrolled, as long as the “off-campus training site” does not meet the campus definition requirements to obtain a facility or sub-facility code. It is at the discretion of the SAA whether or not teaching sites or practicums are approved extension campus locations.
- Schools will only have to recertify for nursing students if their clinical is being held at an extension campus.

Communications

59. How will VA communicate with students about changes to their Monthly Housing Allowance (MHA) after December 1?

- We will send letters to all students explaining how their MHA was calculated for the subsequent term and include information on any rate changes due to Section 501, if applicable. There will be webinars, social media posts, and updates to VA websites on MHA changes. We are also sending schools a communications toolkit this summer to assist with inquiries from students.

60. Will SCOs receive copies of the communications that are sent to students?

- We will send a copy of form letters we send students to SCOs and keep SCOs informed when communications are sent to students.

61. What are the change management and communication strategies aimed at the students and schools on the part of the VA?

- We will keep steady communication with schools leading up to December 1. We will facilitate webinars specifically focused on process changes and training. In addition, VA will push communications regularly via e-mail, social media and this ongoing FAQ document.
- Through the communications toolkits that are issued, stakeholders will be equipped to be a direct line of communication to students. VA welcomes recommendations for best practices on how to best deliver information to students and will be hosting a communications focus group to gather input.

62. What will we tell students who were underpaid about when they will receive money?

- In the coming months, we will provide communications toolkits with high-level messaging points to ensure all stakeholder groups are accurately communicating the proper message to students.

63. When will a communications toolkit be released?

- Over the coming months, VA will release a series of communications toolkits pertaining to various stakeholder groups to include students and SCOs. To inform development, we will be holding a series of review sessions and focus groups to gather feedback.
64. Will VA make their website more user-friendly?
   • We are working to modernize and improve navigation on the website. If you have specific recommendations, send them to FOREVERGIBILL.VBAVACO@va.gov.

65. How is VA using social media to reach students?
   • Social media will be a component of our approach to reaching students. Beneficiaries can use The Post-9/11 GI Bill, U.S. Department of Veterans Affairs Facebook page for up-to-date information on all things GI-Bill related. Important information will also be released through VA and VBA’s main Facebook and Twitter pages.

66. How soon will the Call Center be trained to answer student concerns regarding the monthly housing allowance? Or will there be a special number for them to call?
   • We are working with the call center, so they have all of the available information and are able to answer any student questions. Students will use the same number as for other GI Bill questions.

67. Will ELR’s come out to schools to communicate changes to academic leadership?
   • Please email event details to FOREVERGIBILL.VBAVACO@va.gov.

68. Will schools be able to see the updated functionality before going live with enrollments?
   • Yes. VA will provide an opportunity to show how enhancements to VA-ONCE will allow schools to see and interact with the system. Once we have additional details, VA will send out an invite.

69. Will there be updates if there are processing delays, and how will these be communicated?
   • Yes. VA will send emails, update its website, and use system banners to provide updates.

70. When is the next focus group and how do we find out about them?
   • VA will be sending out additional focus group invites over the coming weeks. Following each focus group, we will be sharing the presentation materials, as well as an updated version of this FAQ document. For questions or to be included on future invite, please send an email to FOREVERGIBILL.VBAVACO@va.gov.

**IT & VA Systems Support**

71. Will there be beta testing of the system prior to December 1 Go-Live?
   • We will work with schools to test the system before the December 1 Go-Live. These working sessions will be scheduled in the coming months.

72. Is there a timeline for all the IT solutions to be implemented?
   • On December 1, 2019, Sections 107 and 501 will be implemented to ensure that Spring 2020 enrollments will be processed according to the Colmery Act.

73. Will VA-ONCE users with “2p” access be able to see all extension sub-facility codes or will they need separate accounts for each?
   • Assistant accounts can have access to multiple facility codes, including extensions.

74. One of the schools I oversee has moved locations. We have a new address and a new phone number for this school. How do I contact VA with this information so that they can update their records in the system?
   • Please contact your SAA. SAAs should send updates to existing campuses to their ELR to manually update. ELRs will be able to make manual updates to data in VA systems until September 30, 2019.
If you have further questions, email FOREVERGIBILL.VBAVACO@va.gov and a VA representative will be in touch.