FDVA

FLORIDA DEPARTMENT OF VETERANS' AFFAIRS

Honoring those who served U.S.

State Approving Agency for Veterans' Education & Training

NONCOLLEGE DEGREE (NCD) SCHOOLS/PROGRAMS

Measurement, Policies, Certification, and Pay for the Various GI Bill® Programs

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Topics

- Measurement
- Certification Preparation
- Policies
- Certification
  - Amendments, Adjustments, Terminations
  - Entitlement
  - Pay
- Miscellaneous

Measurement

Clock Hour Measurement
NCD Programs

Title 38 CFR § 21.4270 – Measurement of Courses

Clock or Credit Hours…

- A clock hour is always defined for VA purposes as 60 minutes of net instruction

- Noncollege Degree (NCD) programs *not* offered by an Institution of Higher Learning (IHL) are measured in *clock* hours

  - All standalone NCD schools, regardless of accreditation status

- Often, NCD programs offered by an accredited IHL and which do not apply to the requirements of a standard college degree program are measured in *clock* hours

  - Can be measured in same manner as collegiate undergraduate course, i.e., in credit hours, as long as that is the way in which the accredited IHL measures them

Clock Hour Measurement
NCD Programs

Title 38 CFR § 21.4270 – Measurement of Courses

- NCD programs offered by accredited IHLs and which are measured by the institution in credit hours are certified to VA in credit hours
  - All rules governing classes that are part of a college degree apply equally to NCD courses measured in the same units by the institution

- All NCD courses offered by nonaccredited schools are measured in *clock* hours

- In *some* cases, degree programs offered by nonaccredited IHLs may be measured in *credit* hours – but *only if* they meet certain criteria…

Clock Hour Measurement
Nonaccredited Institutions/Courses

Title 38 CFR § 21.4272 – Collegiate Course Measurement

- Nonaccredited programs offered by a **nonaccredited** IHL are measured in *clock* hours, unless, for *degree* programs:
  - Course is offered on a semester- or quarter-hour basis, *and*
  - Course leads to an associate, baccalaureate, or higher degree granted by the school under authority of State education agency; *and*
  - School furnishes letters from a State university or letters from three (3) schools that are full members of a nationally recognized accrediting association certifying as to:
    - Acceptance of transfer credit (full value) without reservation *or*
    - Admittance into graduate or advanced professional program without reservation

Clock Hour Measurement
Nonaccredited Institutions/Courses

Title 38 CFR § 21.4272 – Collegiate Course Measurement

- Alternately, degree programs offered by a **nonaccredited** IHL are measured in *clock* hours, unless:
  - IHL is a candidate for accreditation and meets the requirements as specified in the CFR
  - Candidacy for accreditation (for those accrediting agencies recognized by the Secretary of Education for their pre-accreditation status) does not mean the school is approved as accredited. It only means their courses are eligible to be approved on a credit hour basis if that is the way the school measures them.

Accreditation Status
Nonaccredited Institutions/Courses

How a Change in Accreditation Status May Impact Your School…

- For schools/programs that go from accredited to nonaccredited status:
  - May have an adverse effect on the approval of certain programs and policies at your school by the Florida State Approving Agency, including:
    - Approval of credit hour measurement under 38 CFR § 21.4272(a);
    - Approval of courses offered in whole or in part through independent study/online training/distance learning under § 21.4267; and
    - Approval of internships, residencies, and other practical training courses as in-resident training under § 21.4265.
  - You must notify the FDVA State Approving Agency immediately of any changes in accreditation status

Clock Hour Measurement
Are you reporting the correct hours?

What is and is not included in a clock hour

- **Classroom Theory**
  - Allows for 10 minutes to change classes each hour, which can be included in the total hours of instruction (must deduct if not changing classes)
  - Also allows for 10 minutes to change subjects even if students remain in the same classroom, e.g., finish talking about gasoline motors and switch to studying diesel motors

- **Shop Practice**
  - Allowance for 15 minute break in morning; another in the afternoon. Can be included in total hours of instruction. Shorter breaks allowed for part-time enrollment.

Clock Hour Measurement
Are you reporting the correct hours?

- All clock hours reported to VA must exclude any lunch or meal breaks
  - The morning and afternoon breaks in a **shop practice** predominated class may **<u>not</u>** be combined for a half hour lunch

Clock Hour Measurement
Are you reporting the correct hours?

■ **Classroom/Theory Schedule – Example**

DAYTIME CLASS SCHEDULE Monday - Friday	
Class start time	9:00 a.m.
Morning break	10:15 a.m. – 10:30 a.m.
Lunch break	12:00 p.m. – 1:00 p.m.
Afternoon break	2:30 p.m. – 2:45 p.m.
Class end time	4:30 p.m.

Clock Hour Measurement
Are you reporting the correct hours?

- Certify the actual number of clock hours per week the student is *scheduled* to attend, <u>not</u> the minimum it takes to be full-time nor the number of hours the student actually attends class
  - Certified hours will be compared with those listed on the enrollment agreement and class schedules
  - No averaging unless it does not change training time or rate of pursuit
    - This may be done **<u>only</u>** if the student is full-time/100% rate of pursuit (ROP)
    - This does **<u>not</u>** apply for less than full-time/less than 100% ROP

Clock Hour Measurement
Predominating Designation of NCD Programs

How the Difference Affects Payment of Benefits
Training Time (Chapters 30, 32, 35, 1606, and 1607)

CLASSROOM THEORY		SHOP PRACTICE	
Clock hours net instruction per week	**Training Time**	**Clock hours net instruction per week**	**Training Time**
18	Full-time	22	Full-time
13 – 17	¾-time	16 – 21	¾-time
09 – 12	½-time	11 – 15	½-time
05 – 08	Less than half; more than ¼-time	06 – 10	Less than half; more than ¼-time
01 – 04	¼-time	01 – 05	¼-time

Clock Hour Measurement
Predominating Designation of NCD Programs

How the Difference Affects Payment of Benefits
Sample Calculations for Rate of Pursuit (Chapter 33)

CLASSROOM THEORY		SHOP PRACTICE	
Clock hours net instruction per week	Rate of Pursuit	Clock hours net instruction per week	Rate of Pursuit
18+ (full-time)	100%	22+ (full-time)	100%
15	80%	18	80%
10	60%	15	70%
09	50%	11	50%

Divide **scheduled** clock hours per week by full-time requirement (18 for CT; 22 for SP)
Anything above at or above 18 for CT and/or 22 for SP will result in 100% RoP

Certification Preparation

Before you Certify
Get organized – Be prepared

Do you have everything you need **before** you certify a student's enrollment to VA?

- VA education documents
  - Application for VA education benefits (all but Ch. 31)*
    - 22-1990 or 22-5490
  - Change of program or place of training form
    - 22-1995 or 22-5495
    - Not necessary if changing programs while at the same school
      - In accordance with guidance from the Florida VA Outreach Office, when prompted in VA-ONCE, indicate you have the form on file
  - Certificate of eligibility*
    - Do you know which chapter of benefits/level of eligibility?
    - Does the student know which chapter of benefits/level of eligibility?

*Not mandatory, but helpful

Before you Certify
Get organized – Be prepared

Do you have everything you need **before** you certify a student's enrollment to VA?

- VA education documents (cont.)
  - No VA documents?
    - Contact the SCO hotline for chapter and eligibility
  - If you cannot identify eligibility, and student still wants to be certified…
    - You should certify her/his enrollment anyway and let VA adjudicate the student's case
  - WEAMS Report (aka 22-1998)
    - Ensure all programs in WEAMS and VA-ONCE match each other, and are current and accurate

Before you Certify
Get organized – Be prepared

- **Various Chapters of VA Education Benefits**

Education Program	Associated Chapter
Montgomery GI Bill®	30
Veterans Educational Assistance Program (VEAP)*	32
Post-9/11 GI Bill®	33
Survivors' and Dependents' Educational Assistance (DEA)	35
Montgomery GI Bill Selected Reserve (MGIB-SR)	1606
Reserve Educational Assistance Program (REAP)	1607
Vocational Rehabilitation and Employment (VR&E)	31

*6 VEAP cases nationwide; none in Florida

Before you Certify
Get organized – Be prepared

- Chapter 35 Payee Chart

Chapter 35 Dependents' Educational Assistance Program (DEA)		
Payee #	**Person Entitled**	**Suffix**
10	Spouse or Surviving Spouse	W
41	First Child to Apply	A
42	Second Child to Apply	B
43	Third Child to Apply	C
44	Fourth Child to Apply	D
45	Fifth Child to Apply	E
46	Sixth Child to Apply	F
47	Seventh Child to Apply	G
48	Eighth Child to Apply	H
49	Ninth Child to Apply	I

Before you Certify
Get organized – Be prepared

Do you have everything you need *before* you certify a student's enrollment to VA?

- Student/school records
  - Application
  - Enrollment agreement/contract
  - Registration documents
  - Class schedule – ensuring certification of only required courses
    - Hours per day; days per week
    - Beginning and end dates of each course and/or enrollment period
    - Modality of courses (lock step or competency based – in resident training)
    - Schedule required for each course within each period certified

Before you Certify
Get organized – Be prepared

Do you have everything you need **before** you certify a student's enrollment to VA?

- Student/school records
  - Record of previous education and/or training and evaluation of such - must be documented
  - Student ledger/account
    - Detailing tuition and fee charges and source of payments
  - Scholarship documentation
  - Yellow ribbon documentation
    - Not applicable at standalone NCDs or nonaccredited institutions
  - Enrollment reports for 85-15% ratio calculation
    - Know when to calculate

85-15% Ratio Exercise

Before you Certify
Get organized – Be prepared

Be prepared for what may and/or will occur *__after__* you certify a student's enrollment to VA

- Student/school records (may impact initial certification)
  - Attendance
    - Who tracks and who will provide records?
    - Understand your SAA-approved attendance standards policy
  - Withdrawal and drop action/slips
  - Leave of absence requests
  - Approved schedule changes
    - Course
    - Times and/or dates
    - Length of program
    - Modality (restrictions for NCD programs; discussed in other section)

Before you Certify
Get organized – Be prepared

Be prepared for what may and/or will occur **after** you certify a student's enrollment to VA (cont.)

- Student records (may impact initial certification)
  - Disciplinary action taken
  - Standards of Progress
    - Academic probation
    - Understand your SAA-approved standards of progress policy
  - Grade reports
    - Did student complete course?
  - Transcripts
    - Did student graduate?

Before you Certify
Get organized – Be prepared

Be prepared for what may and/or will occur *after* you certify a student's enrollment to VA (cont.)

- **Retain** VA paperwork
  - Copies of all submitted enrollment certifications (VA Form 22-1999)
  - Copies of all notices of changes in student status (VA Form 22-1999b)
  - Any correspondence to or from VA related to the student
- **Retain** All documents relating to each student's enrollment
  - Transcripts
  - Grade reports
  - Attendance records
  - Drop/withdrawal slips, etc.

  Must be retained by the school for at least **three years** following the ending date of the last period certified to VA.

Policies

Attendance Policy
Know it

- In the real world of work, employees are expected to show up for work at the times specified by the employer and not those specified by the employee. Employees who have poor attendance on the job also have a poor employment record. Your attendance policy helps prepare students for employment.

- Students who have unusual attendance problems due to extended illness, very frequent medical appointments, etc., should consider taking a leave of absence until those problems are resolved.

Attendance Policy
Know it

- Know and understand your **SAA-approved** attendance policy
  - Often times, it is different than the policy for your other students
    - Requires definite points in time in which action must be taken
      - Verbiage such as "may be" or "could be" are not acceptable
      - Terms such as "shall be" or "will be" are acceptable
- Policy for VA students may be a percentage of course hours or total number of absences
  - Percentage preferred – will not differentiate between excused and unexcused absences
    - The absences allowed under a percentage policy should be more than sufficient to allow for illness, medical appointments, etc.
    - They are not intended to allow for students just to skip class, take time off for a trip, etc.

Attendance Policy
Monitor / Records

- Ensure you are monitoring VA students' attendance
  - Maintain detail in file
    - We must see a record of:
      - every day the student was scheduled;
      - the number of hours per day the student was scheduled; and
      - how many hours the student actually attended.
    - Attendance records must be a daily record of the student's actual attendance and must be "positive" rather than "negative" records
      - Negative attendance records (marking only when the student is absent) are <u>not</u> acceptable

Attendance Policy
Monitor / Records

- All NCD programs measured on a clock hour basis, and those offered at an IHL that are measured in credit hours and are not an integral part of a standard college degree where attendance is required, must maintain attendance records for each class

- A student's schedule is not an attendance record and is not sufficient for this purpose

- All instructor-led classes must have a roll book or other record maintained by the instructor to verify each student's attendance
  - Often, a physical sign-in sheet or time clock is used for this purpose and is sufficient as long as the class instructor maintains constant control over it so that s/he actually observes the student signing or clocking in.

Attendance Policy
Enforce

- Enforce the policy if a student fails to meet attendance standards
  - Student's benefits must be terminated if s/he violates attendance standards, i.e., your policy must be followed to the letter without exception
- Ensure you submit within 30 days of the student's last day of attendance (LDA) prior to violating the attendance policy. The LDA is the effective date of the termination.

Attendance Policy
Examples of Approvable Standards

Example

- Attendance is verified on at least a monthly basis by the SCO.

- Students who, for any reason, miss more than 15% of the total scheduled course hours in a calendar month are considered to be in violation of the attendance policy and their VA education benefits will be terminated for unsatisfactory attendance.

Attendance Policy
Examples of Approvable Standards

Example (cont.)

- In order to show that the cause of unsatisfactory attendance has been removed, students must show good attendance (as defined) for one calendar month after being terminated for unsatisfactory attendance without the receipt of VA educations benefits. After such time, the student may be recertified for VA education benefits, but not retroactively to cover the period when the student was showing good attendance.

- Note: One size does **_not_** fit all – the length of the course/program will determine how often you must monitor and enforce.

*Check with your **SAA** if you have policy questions.*

Attendance Exercises

Attendance Policy
How are makeup hours factored into determination?

Makeup Hours

- Must <u>not</u> be factored into the percentage when determining attendance standards
- Makeup hours are not regularly scheduled sessions
- Students must follow a predetermined, set schedule to be certified
- Any charges for makeup hours cannot be certified to VA for reimbursement – they are considered to be a penalty fee
- Becomes independent study (not approved)
- You must not certify makeup hours for payment – VA payment may not be made for such hours

Standards of Progress
Monitor and Enforce

- Know and understand your **SAA-approved** Standards of Progress policy for VA students
  - Must relate to graduation requirements
- Ensure you are monitoring VA students' progress
- There must be a clear, definite point in time when a:
  - VA student will be placed on probation (cannot be indefinite)
    - Report probation through VA's "Ask a Question" via the Internet Inquiry System: https://gibill.custhelp.com (see page 78 of the online SCO handbook)
    - For the purpose of assisting students

Standards of Progress
Monitor and Enforce

- There must be a clear, definite point in time when a:
  - VA student's enrollment will be terminated for not achieving satisfactory progress
    - Law requires VA educational benefits be discontinued when student fails to make satisfactory progress toward completion of training objective (Title 38, USC, Section 3675(b)(1))
    - Report termination of enrollment for unsatisfactory progress through VA-ONCE

Credit for Prior Training
Must be obtained

- Schools must ask students to list/provide all previous education and training
  - To include where they attended, when they attended and in what program(s) they were enrolled
  - Do not ask the student if they *want* any credit transferred in – irrelevant; mandatory and the students have no choice in the matter
- Schools must evaluate that education and training and grant credit as appropriate to the school's published and approved standards
  - Must obtain official transcripts
    - Regardless of whether student previously utilized VA benefits
    - Official transcripts required because schools do not grant *official* credit based on *unofficial* transcripts

Credit for Prior Training
Must be obtained

VA STUDENT PRIOR CREDIT EVALUATION

Student's Name:	
Student's Current Program:	

EDUCATION HISTORY						
Type of School	**Name and Location**	**Program of Study**	**Degree/Certificate Completed**	**Highest Grade Completed**	**Years Attended**	**Y/N***
High School						
Postsecondary Education (Student to list **all** colleges, technical centers, etc., even if VA education benefits were not used)						

Military Training	**Joint Services Transcript (JST)**		

Credit for Prior Training
Must be obtained

Student's Signature:	Date:

AREA BELOW IS FOR SCHOOL USE ONLY

The student referenced above is receiving or may be eligible to receive VA education benefits. As such, Title 38, Code of Federal Regulations §21.4253(d)(3) requires schools to obtain and evaluate official transcripts related to all previous postsecondary education and training, regardless of whether or not the student previously used VA education benefits. In addition, it further requires that schools apply such transfer credit toward the requirements of the student's current program as appropriate under the school's published policy for granting prior credit. Please complete the appropriate information below and return it to the School Certifying Official. NOTE: Credit does not have to be granted if not applicable; however, all must be evaluated and documented.

Transcript: Please attach copies of **all official** transcripts *(attach even if denying transfer credit).*
NOTE: *In the table above, please indicate **Y** for Yes or **N** for No in the far right column as to whether or not an official transcript was obtained.

Evaluation of Hours:
Total **credit** hours granted (indicate semester or quarter hours):
Total **clock** hours granted:

Explanation of non-transfer of hours:

Evaluator's Name and Title (please print):

Evaluator's Signature:	Date:

Credit for Prior Training
Certifications

Florida SAA Policy

38 CFR §§21.4253(c) and 21.4254(d)(14)

- In most instances, schools must receive all transcripts:
  - For programs on a **term basis**, within two (2) semesters, three (3) quarters, or the equivalent
  - For courses **not** on a term basis, within 12 weeks if program is at least six (6) months long or prior to the start of the course if less than six (6) months long
- If applicable, schools must grant credit and reduce training time and tuition and fees proportionately
  - Notify *student* and retain in student's records
  - Reviewed during compliance visit

Credit for Prior Training
Certifications

Florida SAA Policy (cont.)

38 CFR §§21.4253(c) and 21.4254(d)(14)

- Some exceptions (not all inclusive)
  - The school which the student attended is not accredited or accredited by an agency not recognized by your school and not credit would ever transfer – document with official school policies and rules
  - A thorough examination of the prior institution's catalog reveals there is no course or program that relates at all to the student's current program at your school. Document with review notes
  - The student attended the school so long ago that your recency of credit rules would not allow any credit to transfer

Independent Study/
Online Training
Prohibited

- Courses/programs taught in whole or in part in an independent study, online, distance learning, hybrid or blended format are *not* approved at any NCD school.

- Also specifically not approved for remedial courses or for any other courses that do not apply to the requirements of a standard college degree.

- NOTE: This also means that study labs where the students come in when they want to during certain hours, *cannot* be approved

Independent Study/
Online Training
Prohibited

- All courses approved at NCD schools must strictly be offered in a traditional classroom, laboratory, or shop setting, i.e., students physically in the same room at the same pre-scheduled time with a live instructor.
  - Closed Circuit Television (CCTV) courses allowed as long as requirements are met
  - CCTV courses will be just like any other traditional classroom sessions with the sole exception that the instructor is present *electronically* (and not physically) with provision for real-time student/instructor interaction
- NCD courses offered at IHLs that are measured in credit hours and apply to the requirements of a standard college degree may be offered in an independent study/online format

Clinicals and Practical Training
Externships/Internships

Clinical and Practical Training/Externships/Internships

- Can be certified only
  - if the program components have been approved by the SAA; and
  - as required by the program of study.

Clinicals and Practical Training
Externships/Internships

Clinical and Practical Training/Externships/Internships

- Provides practical, hands-on experience in the student's program usually, but not always, in the medical field
- Except for some medical-related programs, all such hands-on programs must be accredited by the appropriate agency
- The school controls all aspects of an externship
- The school makes all arrangements with the service provider, such as a hospital, clinic, physician's office, etc., i.e., the student cannot be allowed to make those arrangements
- Hours per day and days per week are set by the school
- Students must conform to the schedules established by the school and not the other way around
- The hands-on training is provided by the hospital, clinic, etc. under a written arrangement with the school

Clinicals and Practical Training
Externships/Internships

Clinical and Practical Training/Externships/Internships (cont.)

- The number and types of procedures and services to be experienced by the students are set by the school

- Attendance records are maintained by the hospital, clinic, etc. and provided to the school on a regular, usually weekly, basis; maintain in VA student's file

- Students must follow all school rules while in an externship, plus adhere to any standards set by the service provider

Approved Course/Program Length
Certification

- Must not certify more hours than the SAA has approved
  - VA will only pay for the student's "seat time" in the classroom for the number of clock hours approved
- Keep track of total hours completed
- Exception *(see page 56 of the School Certifying Official Handbook)*
  - For courses offered on a modular basis, VA will pay students to repeat a module that was failed, but only if that module is scheduled to be repeated during normal, scheduled classroom hours
    - If repeated as makeup hours during non-class time, it may <u>not</u> be certified to VA for payment
    - Be sure to strictly enforce your approved standards of progress and attendance policies

Approved
Course/Program Length
Certification

- NCD courses offered at IHLs and which are measured in credit hours may be repeated to achieve a passing grade just the same as any other credit hour course at that institution

- Course/Program name certified must match what is listed in the WEAMS report (aka VA Form 22-1998)
  - Incorrect wording may impact whether payment is made
  - If WEAMS is correct, then update VA-ONCE
  - If WEAMS is incorrect, then submit a request to have it updated with correct information

Approved
Course/Program Length
Certification

NEW

Recently, claims processing procedures were modified and the Claims Examiners at the Regional Processing Offices must review the period certified with the approved length of the program when processing the enrollment. If the enrollment period certified exceeds the SAA-approved length of the program plus a small margin for variables such as holidays, the Claims Examiners must contact the Education Liaison Representative (ELR) of jurisdiction before denying the claim.

Approved
Course/Program Length
Certification

Q: **WHAT DOES THIS MEAN FOR YOU?**

A: To minimize denial of enrollment certifications submitted, you must carefully review the enrollment period and validate that the number of hours on the enrollment certification does not exceed the number of hours approved by the State Approving Agency and reflected in WEAMS.

Approved
Course/Program Length
Certification

Q: **HOW DO YOU DO THIS?**

A: An NCD program length worksheet has been created as a tool for your use.

Q: HOW DOES THE WORKSHEET WORK?

A: When you enter the approved program length in clock hours, the number of clock hours the student is scheduled to attend per week, and the student's start date (first date of attendance), the attached worksheet will divide the approved length of the program by the number of clock hours per week the student is scheduled to attend, and will arrive at the ending date to be certified.

Q: CAN YOU AMEND THE END DATE IF THE ACTUAL LAST DAY OF ATTENDANCE IS DIFFERENT?

For Competency-Based Programs (Open entry, open exit, not operating on a term or lock-step/modular basis)

A: If the student successfully completes the program and the actual last day of attendance is *before* the ending date certified, an amendment reflecting the earlier date must be submitted.

A: If the actual last day of attendance is *after* the ending date certified, no action is necessary. Do not submit adjustments for absences that are allowed within the school's approved attendance policy. You may not extend enrollment for students who need additional hours simply because of absences.

Approved
Course/Program Length
Certification

EXCEPTION

- **An exception is for when a student is placed on an authorized leave of absence (LoA) for which VA education benefits are not paid. In such a case you will follow the standard procedure for such occurrences:**

  - Amend the student's enrollment certification for a new ending date based upon the length of the student's LoA

  - In remarks specify that the student was placed on a leave of absence for (dates) for which VA education benefits should not be paid

  - The RPO will then interrupt the student's award for that period (in effect, creating a donut hole) and will extend the student's award accordingly

Approved
Course/Program Length
Certification

Q: **WHAT IF YOU HAVE ALREADY SUBMITTED AN ENROLLMENT CERTIFICATION THAT HAS NOT BEEN PROCESSED AND EXCEEDS THE ALLOWABLE LENGTH?**

A: The Claims Examiner will contact the ELR before awarding or denying the claim. The ELR will check the approved length with the enrollment certified. If the period certified is excessive, the ELR will notify the Claims Examiner who will then deny the claim. The Claims Examiner will notify the Certifying Official through written correspondence. If this happens, the Certifying Official should carefully review the enrollment certified with the worksheet. If appropriate, the Certifying Official may resubmit a corrected enrollment certification.

Approved
Course/Program Length
Certification

HOW DOES IT WORK IF THE PROGRAM OPERATES ON A TERM OR LOCK-STEP/MODULAR BASIS?

- For term or lock-step/modular programs:
  - Certify enrollment for each term and each module/class separately
  - The total clock hours certified must not exceed the number of clock hours for which the program is approved
  - If a student fails a module/class and the student must repeat the module/class, then you may certify the enrollment of the student in that module/class again
    - When doing so, specify in Remarks that the student is retaking a module/class that that s/he had failed

Certification

Enrollment Periods
Are you reporting the correct periods?

- **Term**: Any regularly established division of the ordinary school year under which the school operates
- **Quarter**: A division of the ordinary school year from 10 to 13 weeks long
- **Semester**: A division of the ordinary school year from 15 to 19 weeks long

If a school offers training on a **nonstandard** term basis, the beginning and ending dates of each term, session, module, or lockstep must be shown separately.

Enrollment Periods
Are you reporting the correct periods?

Schools <u>not</u> operating on a term basis

- Typically, this category includes many public and private NCD schools which operate their courses on the principle of competency-based instruction, open entry/open exit (each student learns the course material at his/her own pace and receives a certificate of completion when all competencies have been learned).

- Programs that may fit this classification:
  - Cosmetology
  - Barbering
  - Auto Mechanics
  - Carpentry, etc.

Enrollment Periods
Are you reporting the correct periods?

Schools <u>not</u> operating on a term basis (cont.)

- Students just starting the course, and others ready to complete the same course, will be in the same classroom/shop at the same time with the same instructor. For such courses, an SOP may require specific grades/scores at the end of each grading period with probationary periods of one or two grading periods.

- Such schools may have administrative divisions called semesters or terms, but they are not treated as such because the transition from one such term to another is seamless to the student, i.e., at the start of the next term the student is in the same class and just picks up where s/he left off at the end of the previous term.

Enrollment Periods
Are you reporting the correct periods?

Schools <u>not</u> operating on a term basis (cont.)

- With all NCD programs which do not operate on a term basis, the school should enter the exact date on which the student first attends as the beginning date of the enrollment period certified to VA.

- The ending date should be reported as previously explained using the NCD program length worksheet.

First and Last
Dates of Attendance
Amending vs. Terminating

Schools <u>not</u> operating on a term basis (cont.)

- The starting date of a student's enrollment for schools not operating on a term basis must be the actual day s/he began the class
  - Must be tied to an actual date of attendance
  - Must *amend* the date if it is different from what was initially certified, i.e., the date the student first attended class
    - If student is absent the first scheduled day of class, VA cannot pay benefits for that day, i.e., VA does not pay for a student to start with an absence or absences.
    - Impacts payment for all chapters since there is no longer break pay

First and Last
Dates of Attendance
Amending vs. Terminating

Schools <u>not</u> operating on a term basis (cont.)

- The ending date of a student's enrollment must be the actual last day s/he attended the class, completed all competencies, or reached the approved number of clock hours

    - For completion of the program, *<u>amend</u>* the date if it is before the anticipated date *(no action is necessary if the date is after)*

    - If the beneficiary withdraws, *<u>terminate</u>* the enrollment and report the effective date as the last date of attendance

    - For unsatisfactory attendance or progress, *<u>terminate</u>* the enrollment and report the effective date as the last day the student was in class prior to violating the attendance or standards of progress policy

Schools <u>not</u> operating on a term basis (cont.)

- Tuition and fees are generally paid up front; however, some schools do have incremental billing (covered in Certifying Tuition slide)

- Students are issued their certificate of completion once they learn all the competencies taught in the program

- VA pays to the point they earn their certificate or have sat in the classroom for the approved hours of the program – *whichever comes first*

Beginning & End Dates
Are you reporting the correct periods?

Schools operating on a term basis in _clock_ hours

- This includes schools/courses that operate on a modular basis or other system wherein students complete a section of each course in **lock-step** and actually start a new subject at the start of the next enrollment period

- Schools must certify these courses on a term basis, i.e., each term/enrollment period/module shown separately with beginning and ending dates of each term/enrollment period/module

- Still must show actual last date of attendance when a student's enrollment is ended and you must terminate that enrollment period

Beginning & End Dates
Are you reporting the correct periods?

Schools operating on a term basis in _clock_ hours (cont.)

- Where a program is bundled, i.e., consists of a group of individual objectives which may be approved on their own because they are an objective on their own:
  - Each individual objective with its own certificate of completion must be certified with its own start and stop date as well as tuition and fees
  - Such individual objectives may be approved as separate courses on their own (we will also look at CIE approval)
- If individual components as described above do not lead to an objective and certificate on their own, they **cannot** be approved on their own
  - NOTE: Course/program approval information in subsequent slides

Beginning & End Dates
Are you reporting the correct periods?

Schools operating on a term basis in _credit_ hours

- Certified just the same as would a degree program
- Only the case if it is an IHL with NCD programs
  - Standalone NCD schools or nonaccredited IHLs that are not a candidate for accreditation are not eligible to be approved in credit hours (refer back to slides 6 and 7 for explanation)
- Program consists of individual unit subjects that are pursued consecutively
- Certified based on the school's published calendar term dates with definite stop and start dates
- Tuition and fees certified for each term
  - If, as is the practice of some schools, all tuition and fees are billed up-front, then they must be prorated for each enrollment period (see section on entitlement charge for the reasons for doing this)

Certifying Tuition & Fees
Chapter 33

Certify <u>Net</u> Tuition & Fees – 38 §CFR 21.9505

- Certify the **actual** amount of tuition charged (at the in-state rate) <u>**less**</u> any scholarships, discounts, waivers, or other payments directly to or by the school and *designated solely for tuition and fees*

- This does **not** include any Title IV payments, even if specifically for tuition and fees
    - By law, VA education payments and payments under Title IV do not impact each other in any way

- Third-party payments that are intended to cover the cost of tuition, but which **also** may be used for other educational costs are **not** deducted from tuition certified to VA for payment *(know the terms of such payments)*

Certifying Tuition & Fees
Chapter 33

Certify <u>Net</u> Tuition & Fees – 38 §CFR 21.9505 (cont.)

- If a VA student is eligible for Chapter 33 benefits at less than the 100% level, and the school or other entity has a program to pay for the student's unmet needs, then any such payment must be deducted from the total charges certified to VA.

Example:

- A student is eligible at the 50% level and total tuition and fees charges are $5000. VA would pay $2,500.

- But, if the school then waives the remaining $2,500 so the veteran does not have to pay any tuition and fees, then…

  The school must ensure the enrollment to VA reflects

  total charges of $2,500 and VA will then pay $1,250.

Certifying Tuition & Fees
Chapter 33

Deducted	Not Deducted
Florida Purple Heart Waiver	Title IV Financial Aid
Military Tuition Assistance	Florida Prepaid Tuition
Employer payments or private scholarships paid directly to the school specifically designated for T&F	Florida Student Assistance Grant (FSAG)
ROTC Full Scholarship	Florida Bright Futures Scholarship
Florida Resident Access Grant (FRAG)	
Government Employees Training Act (GETA)	
Military Spouse Career Advancement Accounts (MyCAA)	
Health Professionals Scholarship Program (HPSP)	

Certifying Tuition
Are you reporting the correct dollar amounts for Chapter 33?

- **Certify only *allowable* fees**

  Validity of Fees – Before a fee can be certified to VA, it must meet all of the requirements stated below:

  - Be listed in the school's approved catalog as a fee;
  - Be listed on the student invoice/payment ledger as a fee;
  - Be listed in the enrollment agreement/contract between the student and school as a fee;
  - Not be considered a preadmission or penalty fee; and
  - Be ***mandatory*** or otherwise ***required*** of all similarly circumstanced students, ***without exception.***
  - If unsure, ask the SAA or VA

Certifying Tuition & Fees
Chapter 33

Examples (not all-inclusive) of:

Fees that **can** be included
- Student services fees
- Technology fees
- Lab fees
- Mandatory graduation fees
- Health insurance premiums (if not waived)

Fees that **cannot** be included
- Application fees (aka preadmission fees)
- Books*
- Fees for transportation, food, lodging
- Penalty fees, e.g., late registration, late course changes, fees for makeup hours, etc.

*Unless the books are required of everyone to be purchased from the school (no exceptions)

Certification & VA-Once Exercises

Pro Rata Refund Policy
Nonaccredited courses/programs

- The refund policy must be pro rata or more advantageous to VA students than pro rata **and** be pro rata to the very end
- Example 1
  - Student drops out after completing 75% of the course; the school must refund 25% of the tuition & fees to the student.
    - In this case, with a Chapter 33 student, VA will create an overpayment for that tuition & fees in the student's account and the school refund will give the student the funds s/he needs to repay that debt.
- Example 2
  - Student cancels enrollment before the start of class; 100% of the tuition and fees must be refunded (less up to a $10 registration fee)
    - In this case, with a Chapter 33 student, the amount will be refunded to VA once the school receives the appropriate letter from the Debt Management Center. The school will not refund those charges to the veteran.

Pro Rata Refund Policy
Nonaccredited courses/programs

- An accredited school may possibly have a nonaccredited program to which the pro rata (to the very end) refund policy would apply

- Not required for accredited programs

- Follow published refund policy
  - If school's status changes from nonaccredited to accredited, and school does not wish to retain the nonaccredited pro rata refund policy, it must submit to the SAA:
    - An addendum to the catalog; or
    - A written request to rescind the nonaccredited pro rata refund policy addendum

Pro Rata Refund Exercises

Certifying Tuition
Chapter 33

- If a school charges all tuition up-front
  - Tuition certified to VA should be *prorated between enrollment periods*
  - Proration at *nonaccredited* schools is interwoven with the *pro rata* refund policy
  - **Important** because of the way **entitlement** is charged
    - If one enrollment period lists all tuition and fees for an entire program up-front, entitlement charged based on tuition and fees certified
    - If subsequent enrollment periods are certified with $0.00 in tuition and fees, entitlement will be charged based on the rate of pursuit (results in VA student's entitlement getting hit twice)

Certifying Tuition
Chapter 33

- If a school does **not** charge all tuition up-front
  - Tuition certified to VA should be submitted in the same *increments* as which it is billed to the students
  - **Important** because if the school bills in increments, certifies all charges to VA up front, then the student drops, VA will charge the student with a large debt for tuition and fees that have not actually yet been charged

Certifying Tuition
Entitlement

- All Stand-alone public and private NCD Schools (not part of a college or university)
  - VA charges entitlement differently than how they charge it for accredited public IHLs for Chapter 33 beneficiaries
    - Essentially, VA charges 12 months of entitlement for each $22,805.34* paid for tuition and fees, prorated up to that yearly maximum. This comes out to one (1) day of entitlement charged for *each* $63.35 paid:
    - VA annual cap / 360 days** = daily charge of entitlement
    - $22,805.34 / 360 = $63.35

*Current annual cap as of August 1, 2017
**VA computers calculate every month as 30 days in length; therefore, 12 months x 30 = 360 days

Certifying Tuition
Entitlement

- **Example 1**
  - First student enrolled Jan 15th through May 14th for 30 clock hours per week with a tuition charge of $3,000. Although this student is enrolled at 100% ROP for about four (4) months, VA will charge the student only 1.6 months of entitlement.

This is based upon dividing the $3,000 total charges by the daily rate of $63.35 (as calculated in previous slide). The result of 47.36 days / 30 days = 1.6 months.

Certifying Tuition
Entitlement

- **Example 2**
  - Second student enrolled Jan 15th through May 14th for 30 clock hours per week with a tuition charge of $23,000.00.
  - Although this student is enrolled for *only 4 months* at an ROP of 100%, VA will charge the student *12 months* of entitlement because VA paid the maximum $22,805.34 for the academic year.
  - Refresher (from Slide 81);
    - One (1) day of entitlement charged for *each* $63.35 **paid**
    - VA annual cap / 360 days** = daily charge of entitlement
    - $22,805.34 / 360 = $63.35

Certifying Tuition
Entitlement

- **Multiple Periods of Enrollment**
  - Same first student enrolled for the following periods and charges:
    - EP-1 Aug 15th – Dec 14th   30 clock hours $1,000 total charges
    - EP-2 Jan 15th – May 14th   30 clock hours $1,000 total charges
    - EP-3 Jun 1st – Oct 1st   30 clock hours $1,000 total charges
  - Although this student has been enrolled for a total of 12 months of enrollment at the 100% RoP (proportionately for lesser RoP), VA will charge only 1.6 months of entitlement based on the total charges of $1,000 each enrollment period
  - EP charges / daily entitlement rate = number of days of entitlement charged for *each* enrollment period
  - $1,000 / $63.35 = 15.8 days of entitlement *each* enrollment period for a total of 47.36 days or 1.6 months)

Certifying Tuition
Entitlement

- **Multiple Periods of Enrollment (up-front charges)**
  - Same first student enrolled the same way; however, all tuition and fees are charged up-front for the first enrollment period. If you don't prorate, more entitlement is charged:
    - EP-1 Aug 15th – Dec 14th   30 clock hours $3,000
    - EP-2 Jan 15th – May 14th   30 clock hours   No charges
    - EP-3 Jun 1st – Oct 1st   30 clock hours   No charges

This student was charged 9.6 months of entitlement compared to 1.6 months as noted on the previous slide where the amount was prorated.

Calculation follows…

Certifying Tuition
Entitlement

- **Multiple Periods of Enrollment (up-front charges)**
  - EP-1 Aug 15th – Dec 14th   30 clock hours $3,000
  - EP-2 Jan 15th – May 14th   30 clock hours   No charges
  - EP-3 Jun 1st – Oct 1st   30 clock hours   No charges

Enrollment Period 1: 1.6 months entitlement charged

$3,000 / $63.35 = 15.8 days / 30 days = 1.6 months

Enrollment Period 2: 4 months entitlement charged

Since there are four (4) months in this enrollment period and no charges associated with the enrollment period, VA charges just as they would for the other GI Bill programs, i.e., one (1) month of entitlement for each month enrolled at 100% ROP (proportionately for lesser RoP)

Enrollment Period 3: 4 months entitlement charged (same as EP-2)

Total all enrollment periods: 9.6 months

Certifying Tuition
Entitlement

- Same second student enrolled for the following periods and charges:
    - EP-1 Aug 15th – Dec 14th   30 clock hours $7,610 total
    - EP-2 Jan 15th – May 14th   30 clock hours $7,610 total
    - EP-3 Jun 1st – Oct 1st   30 clock hours $7,610 total
- Based again upon a daily rate of $63.35, VA would charge about 120 days (or approximately 4 months) for *each* of the enrollment periods for a total of 12 months of entitlement. Because all enrollment periods <u>began</u> during the same academic year (August 1 – July 31) VA will only pay $22,805.34 (annual cap), student will be charged 12 months of entitlement
- $7,610 / $63.35 = 120 days /30 days = 4 months for each of the 3 enrollment periods
- 4 months x 3 EPs for a total of ≈12 months (12 months actually paid)

Certifying Tuition
Entitlement

- Same second student enrolled for the same periods; however, all tuition and fees are charged up-front for the first term/period:
  - EP-1 Aug 15th – Dec 14th   30 clock hours $22,830 total
  - EP-2 Jan 15th – May 14th   30 clock hours   No charges
  - EP-3 Jun 1st – Oct 1st   30 clock hours   No charges

As you may have surmised by now, VA would have charged 12 months of entitlement for the first term since they would have paid a year's worth of total charges. Then, with no charges for the last two (2) terms, VA would charge about four (4) months entitlement for each of those terms. That means the student would have used up a total of 20 months of entitlement even though enrolled for a total of only 12 months.

Certifying Tuition
NCD Entitlement Extension

- Chapter 30 *or* Chapter 33 NCD Clock Hour Program
  - When entitlement exhausts during a term:
    - Extension is automatically granted for 12 weeks or to the end of the term, whichever comes first – provided that when entitlement exhausts, student has completed at least one-half his/her term
  - When entitlement exhausts during an enrollment at a school which does not operate on a term basis:
    - Extension is automatically granted for 12 weeks or to the end of the course, whichever comes first – provided that when entitlement exhausts, student has completed at least one-half her/his course
- Chapter 30 or Chapter 33 NCD credit hour courses offered at an IHL are treated the same as any other college class for entitlement extension

Certifying Tuition
Chapter 33

- Prorating tuition between the enrollment periods allows for VA to calculate the correct amount of a payment/overpayment should there be a change in the enrollment

Miscellaneous Certification
How to report a Leave of Absence (LOA)

- Reporting a Leave of Absence
  - Submit an amendment to the original certification changing the end date of the enrollment period to match the "new" projected graduation date after adjusting for the LOA
  - Insert a remark under "Other" stating: "Student was on LOA [enter dates]"
    - If the student does not return, submit a termination using the last date of attendance.

Miscellaneous Certification
How to report a scheduled weekly clock hour variance

- **Option 1**
  - Enter the breakdown in the remarks section:

Enroll Dates TT/FT=		Res	Dist	R/D	Clock	T&F	Yellow Ribbon	
Begin	End	Hrs	Hrs	Hrs	Hrs	Amt	Program Amount	Out St Chg
09/04/2013	10/11/2013	0.0	0.0		15.0	$600.00		

Remarks

09/04/2013-10/11/2013:

09/04/2013-10/11/2013: (Weekly schedule) 9/1-9/7=15 hrs, 9/8-9/14=15 hrs, 9/15-9/21=20 hrs, 9/22-9/28=20hrs, 9/29-10/5=15 hrs, 10/6-10/11=20 hrs

Miscellaneous Certification
How to report a scheduled weekly clock hour variance

- **Option 2**
  - Submit an adjustment for each increase/reduction
  - If a program is measured in clock hours, benefits are paid based on clock hours of attendance per week. The beginning date, ending date, and number of clock hours a student is scheduled to attend each week must be reported. If clock hours per week vary and the benefit amount is affected, the variance must be reported for calendar weeks, Sunday through Saturday, between the beginning and ending dates.

Note: *The standard accepted legal U.S. definition of a calendar week is Sunday through Saturday and is the definition used for reporting clock hour variances. This rule is different when determining the start date for courses in a program that operates on a term basis (change in rule).*

Miscellaneous

Course/Program Approval
Vocational Objectives

- In order to approve a course/program, the vocational objective must lead to an entry-level job or employment – 38 CFR 21.3021(J)
  - Sometimes, obtaining a certification leads to employment
- A true preparatory course often covers material the student had somewhere else and which is solely to prepare for an exam

  On the other hand…
- A vocational objective is all brand new material and, although it may prepare someone to take an exam, the combination of the course diploma/certificate and passing a specific certification exam can lead to a job

Course/Program Approval
Vocational Objectives

- We must look at the following:
  - Will the completion of the course (even if passing a certification exam is also required) lead to an entry-level job on its own?
    - This is evidence that the course itself leads to a vocation
  - Some courses are career enhancement and do not lead to an entry-level job, but rather help someone climb up the career ladder
    - Most will enhance a person's skills in their current job or perhaps impart skills that may enhance their chances for advancement within their current career
  - Course descriptions
    - After scrutiny, some are not approvable

Course/Program Approval
Vocational Objectives

- NCD courses offered at an IHL through a continuing education department are subject to the same criteria as all other NCD courses
  - Although many continuing education classes cannot be approved because they are intended for career enhancement, some classes lead to a vocational objective as discussed in the previous slide
  - After close scrutiny, such classes may meet the criteria for approval

Course/Program Approval
Vocational Objectives

- The GI Bill® is intended to help someone make the transition from military to civilian life by preparing them to enter positions in the job market.

- Once they have entered the job market, the GI Bill's job is done.

- Job and job ladder enhancement cannot be approved

School Resources
Education, Training & Information

GI Bill website: http://www.benefits.va.gov/gibill/ **(for schools and veterans)**

Education Call Center: **1.888.442.4551 (veterans and dependents)**
Muskogee, OK
7:00 a.m. – 7:00 p.m. (CST), Monday through Friday

SCO Hotline: for SCO use ONLY – contact SAA or ELR for number

Right Now Web (VA's Internet Inquiry System in the "Ask a Question" section of the GI Bill website): https://gibill.custhelp.com/app/utils/login_form/redirect/ask
(for schools and veterans)
- Status of individual unusual/complex cases
- Individual cases that have been pending for a longer than usual time
- Hardship cases
- Written response

School Resources
Education, Training & Information

VA Debt Management Center:

       Email address: **dmc.ops@va.gov**

       Phone number: 800.827.0648

Florida Association of Veteran Education Specialists: www.flfaves.org

Scholarships for Children and Spouses of Deceased or Disabled Veterans:
www.floridastudentfinancialaid.org

Questions?

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