



FLORIDA DEPARTMENT OF VETERANS' AFFAIRS

Honoring those who served U.S.

State Approving Agency for Veterans' Education & Training

Vocational Flight Training and the GI Bill®

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Florida Outreach Office

The 41st Annual
VA/FAVES
Florida
State
Conference
June 5-8, 2017



TradeWinds
Island Grand
Resort



St. Pete Beach,
Florida

Topics

- Introduction and Overview
- Maintaining Approval
- VA Student File and Certification Preparation
- Policies
- Certification
- Pay and Entitlement
- Miscellaneous

Introduction and Overview

Areas of Responsibility

SAA Areas of Responsibility

Jurisdiction

- **Inspection, approval, compliance, and supervision of flight courses**
 - SAA conducts initial inspection visits
 - SAA determines whether Parts 141, 142, and 63 courses and flight school meets approval criteria
 - VA no longer acts as SAA as stated in §21.4250(c)(1)
 - Effective October 1, 2015
 - Unless no SAA
 - **NOTE:** VA has exclusive jurisdiction of Aero Clubs because it is a federal approval
 - Compliance visits conducted by the SAA and VA
 - Supervision and technical assistance provided by the SAA regarding approval

SAA Areas of Responsibility

Jurisdiction

- In a nutshell...
 - SAA approves
 - VA pays and administers benefits

Maintaining Approval

Maintaining Approval

Submission of Catalogs/Bulletins & Addenda

- Catalogs/bulletins and addenda must be submitted to the State Approving Agency (SAA)
 - Part of initial approval criteria
 - Maintenance of approval for the training of veterans and other eligible persons

Mailing Address:

**Florida Department of Veterans' Affairs
State Approving Agency for Veterans'
Education and Training
P.O. Box 31003
St. Petersburg, FL 33731**

- If submitting via email, the SAA has a 6 MB file size limitation. Send to: stagnerc@fdva.state.fl.us

Maintaining Approval

Air Agency Certificate – Submission Requirements

- **Air Agency Certificate (AAC) and Letter of Authorization (LoA)/List of Approved Courses**
 - Submit any time there are changes such as renewals, revisions, etc.
 - If renewal only, i.e., no changes, submit to the SAA *and* VA
 - If revisions, submit to the SAA for approval along with:
 - FSDO-approved TCO and Syllabus for each course
 - Must include List of Effective Pages stamped by the FSDO
 - Only courses listed on the AAC and LoA may be *considered* for approval
 - Air Agency Certificate expiration date will be tied to the catalog/bulletin approved-through date
 - Remembering that other items may impact the “approved-through” date

Maintaining Approval

Air Agency Certificate – Submission Requirements

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

Air Agency Certificate

Number (CERT NO OBTAINED FROM AFS-620)

This certificate is issued to

(NAME OF SCHOOL)

whose business address is

(ADDRESS OF MAIN BASE OF OPERATIONS)

ORLANDO, FL 32822

upon finding that its organization complies in all respects with the requirements of the Federal Aviation Regulations relating to the establishment of an Air Agency, and is empowered to operate an approved PILOT SCHOOL

Maintaining Approval

Air Agency Certificate – Submission Requirements

with the following ratings:

PRIVATE PILOT COURSE
INSTRUMENT RATING COURSE
COMMERCIAL PILOT COURSE
FLIGHT INSTRUCTOR COURSE

FLIGHT INSTRUCTOR INSTRUMENT COURSE
AIRLINE TRANSPORT PILOT COURSE
PILOT GROUND SCHOOL COURSE
SPECIAL PREPARATION COURSES

*This certificate, unless canceled, suspended, or revoked,
shall continue in effect* UNTIL FEBRUARY 28, 2017

By direction of the Administrator

Date issued:

FEBRUARY 23, 2015

MANAGER, ASO-FSDO-15

**This Certificate is not Transferable, AND ANY MAJOR CHANGE IN THE BASIC FACILITIES, OR IN THE LOCATION THEREOF,
SHALL BE IMMEDIATELY REPORTED TO THE APPROPRIATE REGIONAL OFFICE OF THE FEDERAL AVIATION ADMINISTRATION**

Any alteration of this certificate is punishable by a fine of not exceeding \$1,000, or imprisonment not exceeding 3 years, or both

Maintaining Approval

Letter of Authorization/List of Approved Courses Submission Requirements



U.S. Department
of Transportation

**Federal Aviation
Administration**

February 23, 2015

Mr. Chief Flight Instructor
Great Flight School (Y12S)
1234 Aviation Way
Orlando, FL 32822

Dear Mr. Chief Flight Instructor:

FlightSafety Academy is authorized under Air Agency Certificate (Cert No.) to conduct
The following courses of training listed herein:

PRIVATE PILOT COURSE

Airplane Single Engine Land (Examining Authority-Flight Only)
Airplane Multiengine Land

INSTRUMENT RATING COURSE

Airplane (Examining Authority-Flight Only)

COMMERCIAL PILOT COURSE

Airplane Single Engine Land (Examining Authority-Flight Only)
Airplane Multi Engine Land (Examining Authority-Flight Only)

ADDITIONAL AIRCRAFT CATEGORY OR CLASS RATING COURSE

Airplane Multi Engine Land Additional Class (Private) (Examining Authority-Flight Only)
Airplane Multi Engine Land Additional Class (Commercial) (Examining Authority-Flight Only)
Airplane Multi Engine Land Additional Category (Commercial) (Examining Authority-Flight Only)

Orlando FSDO-15
5950 Hazeltine National Dr
Citadel Int'l, Suite 500
Orlando, Florida 32822-0523
407-812-7737, Fax: 407-812-7710

Maintaining Approval

Letter of Authorization/List of Approved Courses Submission Requirements

FLIGHT INSTRUCTOR COURSE

Airplane Single Engine (Examining Authority-Flight Only)

FLIGHT INSTRUCTOR INSTRUMENT COURSE

Instrument-Airplane

AIRLINE TRANSPORT PILOT COURSE

Airplane Single Engine or Multi Engine Land

PILOT GROUND SCHOOL COURSE

Private Pilot Airplane - Instrument-Airplane
Commercial Pilot – Flight Instructor-Airplane
Flight Instructor- Instrument Airplane

SPECIAL PREPARATION COURSES

141.79 (c) Flight Instructor Refresher Course

The list of approved courses expires on February 28, 2017 unless superseded, surrendered, suspended, or revoked.

Sincerely,

Manager

Maintaining Approval

Refresher Courses

■ Refresher course exception

■ 38 CFR 21.4235(e):

- (e) *Some flight courses are refresher training.* The provisions of §§21.5230(c), 21.7020(b)(26), 21.7122(b), 21.7520(b)(20), and 21.7610(b)(4) that provide limitations on payment for refresher training that is needed to update an individual's knowledge and skill in order to cope with technological advances while he or she was on active duty service apply to flight training.
 - (1) An individual who held a Federal Aviation Administration certificate before or during active duty service may have surrendered that certificate or the Federal Aviation Administration may have canceled it. The individual may receive the equivalent of the number of months of educational assistance necessary to complete the course that will qualify him or her for the same grade certificate.
 - (2) A reservist is not eligible for refresher training unless he or she has had prior active duty. (Authority: 10 U.S.C. 16136(b); 38 U.S.C. 3002(3)(A), 3034(a)(3), 3202(2)(A), 3241(a), 3241(b))

Maintaining Approval

Special Curricula

- FAR §141.57
 - Each course is reviewed to determine approvability
 - Just because the FAA approves does not mean course is approved for veterans' education benefits

Maintaining Approval

Catalog/Bulletin Submission

- **Catalog 38 CFR §§21.4254(b) and 21.4151(b)(3)**
 - Catalog (or Veterans' Information Bulletin) submission is a requirement to obtain and maintain approval
 - Must include information such as standards and policies
 - Must be certified true and correct in content and policy
 - Approved through AAC expiration date or until such time another catalog/bulletin or addendum has been published, or changes that affect approval occur, whichever is sooner
 - If currently approved catalog/bulletin is older than two (2) years, it's time to resubmit or request an extension if no changes
 - No changes in two years would be *extremely* rare
 - Remembering any course, rate, aircraft, policy, etc. changes must be submitted for approval

Maintaining Approval

Catalog/Bulletin Submission

■ Catalog Template

- In need of a catalog/bulletin template?
 - Obtain from the SAA – www.floridavets.org
- Cannot locate a copy of the last approved catalog/bulletin?
 - Obtain from the SAA

Maintaining Approval

Catalog/Bulletin Reminder Letters

Reminder letters...

- SAA may send *courtesy* catalog/bulletin reminder letters
 - Timing based upon “through” or “expiration” date assigned to last approved catalog/bulletin
 - Typically aligned with expiration date of the AAC
 - Sent approximately one month prior to “expiration” date

Maintaining Approval

Catalog/Bulletin Reminder Letters

Reminder letters (cont.)...

- Approval notification may look something like this...

Approval is hereby granted for the following:

Veterans' Information Bulletin, Volume #1, Effective February 23, 2015, through February 28, 2017, or until such time another catalog/bulletin, addendum, air agency certificate revision, etc., is published, whichever is sooner, for the following courses only:

Please note that any new publication(s), whether catalog/bulletin, or addendum, must be submitted to the SAA, certified true and correct in content and policy, within 30 days of publication. Air agency certificates must be accompanied by the List of Approved Courses (aka Letter of Authorization).

- A future reminder letter may look something like this...

February 1, 2017

Dear Mr. Chief Flight Instructor:

This is a reminder that our Agency has not approved your school catalog/bulletin, Volume #1, beyond February 28, 2017.

To meet the requirements of the Code of Federal Regulations, approval criteria for your school require that copies of your school's current catalog/bulletin be submitted to this Agency each time they are printed and/or revised. The information in the catalog/bulletin, supplements and addenda must be certified as true and correct in content and policy as required by 38 CFR §21.4253.

Maintaining Approval

Catalog/Bulletin Reminder Letters

Don't forget...

- You must submit
 - If another catalog/bulletin or addendum is published prior to the through/expiration date, or if the AAC is renewed or reissued, school must submit within **30 days** of publication – *each* publication
 - If not, risk suspension or eventual withdrawal for lack of compliance

Maintaining Approval

Acknowledgment/Proof of Issue

■ Nonaccredited School Requirement

- Furnish a copy of the following to each VA student
 - Course outline
 - Schedule of tuition and fees and other charges
 - Regulations pertaining to attendance, grading policy, conduct and rules of operation
 - Typically contained in the *catalog/bulletin*
 - Acknowledgment or Proof of Issue required of student to show receipt of documents

Mandatory compliance survey requirement 38 CFR §21.4254(c)

■ FAA Enrollment Requirement...

Maintaining Approval

Acknowledgment/Proof of Issue

■ FAA Enrollment Requirement

- When a pilot school enrolls or reenrolls a student in an approved course of training, §141.93 requires the student be furnished the following information and materials:
 - A certificate of enrollment containing the name of the course the student is enrolled in and the date of enrollment
 - We must see a copy of the Part 141 certificate of enrollment in the file
 - A copy of the training syllabus required under **§141.55(c)(7)**
 - Obtain/maintain acknowledgement/proof of issue signed by student
 - Ties in with requirements of nonaccredited institutions
 - A copy of the safety procedures and practices developed by the school
 - Obtain/maintain acknowledgement/proof of issue signed by student
 - Also ties in with requirements of nonaccredited institutions

Maintaining Approval

Catalog/Bulletin Submission

■ FAA Enrollment Requirement

■ Acknowledgment sample

141 Receipt of Materials Acknowledgment

I, (flight school student), in conjunction with my enrollment in (Flight School)'s 141 Commercial Pilot Course, hereby acknowledge the receipt of the following:

- Enrollment Certificate
- (Flight School)'s Safety Practices and Procedures
- (Flight School)'s Commercial Pilot Course Syllabus

(Student signature)

- Similar to catalog/bulletin acknowledgment/proof of issue

Maintaining Approval

Catalog/Bulletin

SAMPLE
VETERANS INFORMATION BULLETIN

FOR

ACME FLIGHT SCHOOL

Airport: Ft. Lauderdale Executive Airport

Address: 2400 Commercial Boulevard
Ft. Lauderdale, FL 33311

Telephone: Day and Night:
Emergency:

Services: Flight Training, Sales, Aircraft Rental and Lease, Pilot Shop, CATS Testing Facility

Maintaining Approval

What Must be Submitted to the SAA

■ Types of changes that must be submitted to the SAA

Type of Change	Required Document(s)
Courses (new or revised)	<ul style="list-style-type: none">• Catalog/bulletin or addendum• FSDO-approved TCO and Syllabus for each new or revised Part 141 course of which you are seeking approval (include List of Effective Pages stamped by the FSDO)<ul style="list-style-type: none">• Inform SAA of changes in modality of ground school
Hourly rates	<ul style="list-style-type: none">• Catalog/bulletin or addendum
Ownership (If not received within 30 days of occurrence, automatic suspension)	<ul style="list-style-type: none">• Change of ownership application packet (obtain from SAA) and associated requested documents
Name and/or address and/or phone number	<ul style="list-style-type: none">• Catalog/bulletin or addendum• FAA documents reflecting approved change(s)

Maintaining Approval

What Must be Submitted to the SAA

■ Types of changes that must be submitted to the SAA

Type of Change	Required Document(s)
Aircraft	<ul style="list-style-type: none">• Catalog/bulletin or addendum; List of Aircraft Inventory form (obtain from SAA)• FAA document that lists all Part 141 approved aircraft, e.g. Training Specifications Aircraft Listing

Maintaining Approval

Approved Part 141 Aircraft Listing

LIST OF AIRCRAFT INVENTORY

(Must also provide FAA document that lists the Part 141 approved aircraft)

Name of Flight School:

Aircraft Type (Make/Model)	Registration/Tail Number	HP	Single or Multi engine	Course Code in which Aircraft is Utilized (1)	Hourly Solo Rate	Hourly Dual Rate	Ground School Rate	Pre/Post Hourly Rate	Owned or Leased (2)	Effective Date
*Cessna/C152	N714YD	115	Single	1, 3	\$126	\$192	\$55	\$55	Leased/[list owner]	

*Note: The entry in the first row is for example purposes only.

1. Commercial - ASEL; 2. Commercial AMEL; 3. Instrument; 4. CFI-ASEL; 5. CFI-AMEL; 6. CFI-I; 7. Other (must specify)
2. Provide name of owner for each leased aircraft
3. Where a pilot ground trainer which meets the requirements of FAA 141.44 is utilized by the flight school, the trainer must be identified and hourly rate shown on this list. Identify other costs, such as ground school and the hourly rate on this list.

Maintaining Approval

Approved Part 141 Aircraft Listing

U.S. Department
of Transportation
Federal Aviation
Administration

14 CFR Part 141 Pilot Schools

Training Specifications Aircraft Listing

In accordance with 14 CFR Section 141.39, the certificate holder is authorized to conduct pilot training using the aircraft identified on this training specification.

Table 1 – Authorized Aircraft for Pilot Training

Registration No.	Serial No.	Aircraft M/M/S
N6294M	15284657	CE-152-152
N365DS	17262611	CE-172-M
N859CP	17280540	CE-172-R
N1199H	172S10390	CE-172-S
N36619	28R7837286	PA-28-R201

Maintaining Approval

What Must be Submitted to the SAA

■ Types of changes that must be submitted to the SAA

Type of Change	Required Document(s)
Changes in instructors	<ul style="list-style-type: none">• Catalog/bulletin or addendum<ul style="list-style-type: none">• If chief flight instructor or assistant chief flight instructor, must also receive FAA documents reflecting change(s)
Any other changes related to the catalog/bulletin, such as policies	<ul style="list-style-type: none">• Catalog/bulletin or addendum• FAA-approved documentation as necessary

Maintaining Approval

What Must be Submitted to the SAA

■ Types of changes that must be submitted to VA

Type of Change	Required Document(s)
Certifying Officials (adding or removing)	<ul style="list-style-type: none">VA Form 22-8794*

*While this form is required of VA, a change in certifying officials would also result in the SAA requiring revised catalog/bulletin or addendum to catalog/bulletin.

Why?...

Because the owner(s), instructor(s) and/or administrator(s) have now changed and at least one of those would be considered a school certifying official (SCO). As such, updated information is also required to be submitted to the SAA

Maintaining Approval

VA Form 22-8794



Department of Veterans Affairs

DESIGNATION OF CERTIFYING OFFICIAL(S)

GENERAL INSTRUCTIONS

1. This form **MUST ONLY** be completed by a responsible official with the authority to designate certifying officials for the school or training establishment.
2. This form must be completed whenever there is a change in any of the information. Include the names, titles, and signatures of all certifying officials, not just the changed information.

SPECIFIC INSTRUCTIONS

1. Item 1: Enter the complete name and address of the school or training establishment.
2. Item 2: Enter the certifying official's telephone number.
3. Item 3: Enter the certifying official's fax number.
4. Item 4: Enter the certifying official's e-mail address. As an alternative, you may enter the e-mail address for the office where the certifying official works.
5. Item 5A: Enter the complete name and title for each designated certifying official. Have each person sign the form on the same line as his or her name and title. If any of the certifying officials have limited jurisdiction, note such limitations in Item 6, "Remarks". Use space below if needed.
6. Item 5B: If facsimile (e.g., rubber stamp) signatures will be used for any certifying officials, enter a sample in the appropriate block. In addition, have the individual initial next to the sample.
7. Item 5C: If veterans and other eligible persons will be claiming individualized tutorial assistance, complete these blocks.
8. Items 7 and 8: Sign and date the form. The person signing the form must be a person of significant authority, i.e., registrar, academic dean, or higher.

PURPOSE: This form is used to provide the names and signatures of those individuals who are authorized to certify enrollment information to the Department of Veterans Affairs.

Maintaining Approval

SAA Approval Timeframe

- **Approval timeframe for all but new facility requests**
 - SAA makes determination within 14 **calendar** days of receipt of document(s)
 - Approve or deny
 - Approved:
 - Letter from SAA to school
 - Copy to VA
 - VA enters appropriate information into WEAMS
 - Approval not final until WEAMS is updated
 - VA issues copy of WEAMS report (aka VA Form 22-1998) to school
 - Denied:
 - Letter to school
 - Indicating reasons for denial and requirements for continued consideration of approval

VA Student File and Certification Preparation

Before Certifying to VA

Get organized – Be prepared

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

- VA education documents (not mandatory, but helpful; if you obtain, maintain in file)
 - Application for VA education benefits (all but Ch. 31)
 - VA Forms 22-1990 or 22-1990E
 - Change of program or place of training form
 - VA Form 22-1995
 - Certificate of eligibility (CoE)
 - Do you know which chapter of benefits/level of eligibility?
 - Does the student know which chapter of benefits/level of eligibility?
 - Issuance of CoE means veteran has already applied and been determined eligible

Before Certifying to VA

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 Certifying Official's VA hotline for chapter and eligibility questions
 - If school cannot identify through any of the above means that the person is eligible and student still wants to be certified, school should certify the enrollment anyway and let VA adjudicate the student's case.
 - WEAMS Report (aka 22-1998)
 - Ensure all programs in VA-ONCE are current and accurate

Before Certifying to VA

Various Chapters of VA Education Benefits

Education Program	Associated Chapter	Eligible for Vocational Flight?
Montgomery GI Bill®	30	Yes
Veteran Educational Assistance Program (VEAP)*	32	Yes
Post-9/11 GI Bill® (includes ToE)	33	Yes
Survivors' and Dependents' Educational Assistance (DEA)	35	No
Montgomery GI Bill® Selected Reserve (MGIB-SR)	1606	Yes
Reserve Educational Assistant Program (REAP)	1607	Yes
Vocational Rehabilitation and Employment (VR&E)	31	Yes

*6 VEAP cases nationwide; none in Florida

Basic Student File Requirements

Minimum Records Required

■ §21.4263(3) Approval of flight training courses

A flight school must keep at a minimum the following records for each eligible veteran, servicemember*, or reservist pursuing flight training (*for at least **three (3)** years following the end of each enrollment period*):

- (i) A copy of his or her private pilot certificate;
- (ii) Evidence of completion of any prior training that may be a prerequisite for the course;
- (iii) A copy of the medical certificate required by paragraph (a)(2) of this section for the courses being pursued and copies of all medical certificates (expired or otherwise) needed to support all periods of prior instruction received at the current school;
- (iv) A daily flight log or copy thereof;
- (v) A permanent ground school record;

*Note that Transfer of Entitlement (ToE) beneficiaries are included

Basic Student File Requirements

Minimum Records Required

■ §21.4263(3) Approval of flight training courses

- (vi) A progress log;
- (vii) An invoice of flight charges for individual flights or flight lessons for training conducted on a flight simulator or advanced flight training device;
- (viii) Daily flight sheets identifying records upon which the 85-15 percent ratio may be computed;
- (ix) A continuous meter record for each aircraft;
- (x) An invoice or flight tickets signed by the student and instructor showing hour meter reading, type of aircraft, and aircraft identification number;
- (xi) An accounts receivable ledger;
- (xii) Individual instructor records;
- (xiii) Engine log books;

Basic Student File Requirements

Minimum Records Required

■ §21.4263(3) Approval of flight training courses.

- (xiv) A record for each student above the private pilot level stating the name of the course in which the student is currently enrolled and indicating whether the student is enrolled under 14 CFR part 61, part 63, part 141, or part 142;
- (xv) Records of tuition and accounts which are evidence of tuition charged and received from all students; and
- (xvi) If training is provided under 14 CFR part 141, the records required by that part, or if training is provided under 14 CFR part 142, the records required by that part.

(Authority: 38 U.S.C. 3671, 3672, 3676, 3690(c))

Before You Certify

Pilot Certificates/Licenses and Ratings

■ Pilot Certificates/Licenses

- A student must already possess a valid Private Pilot certificate/license or higher pilot certificate such as commercial pilot – 38 USC 3034(d)(2)
 - Private pilot courses not approved
- Maintain copy of front and back of license in file
- Commercial Pilot and Instrument Rating are the first courses for which GI Bill® benefits may be paid
 - Must pursue both simultaneously (unless student already has a Commercial Pilot certificate) – 38 CFR 21.4235 (c)(2)
- Before being approved for more advanced licenses/ratings (MEL, CFI, ATP, etc.), a student must possess a Commercial license with an Instrument endorsement

Before Certifying to VA

Pilot Certificates/Licenses and Ratings

■ Pilot Certificates/Licenses (cont.)

- Before pursuing the ATP, VA students must have already logged the applicable flight time the FAA requires to exercise the privileges of an ATP
- ATP-CTP required prior to taking the FAA written exam for multiengine ATP
 - 40 hour course
 - 30 hours ground
 - 10 hours simulator training (six (6) hours or more must be in Level C or higher full-flight simulator)

Before Certifying to VA

Pilot Certificates/Licenses and Ratings How they Impact Simultaneous Enrollment

■ Pilot Certificates/Licenses (cont.)

- 38 CFR 21.4253(b)(2) VA will pay educational assistance to an eligible individual for an enrollment in an instrument rating course only if the individual ***simultaneously enrolls*** in a course required for a commercial pilot certificate for the category for which the instrument rating course is pursued or if, at the time of enrollment in the instrument rating course, the individual has a commercial pilot certificate issued by the Federal Aviation Administration for such category. The enrollment in an instrument rating course alone does not establish that the individual is pursuing a vocational objective, as required for VA purposes, since that rating equally may be applied to an individual's private pilot certificate, only evidencing an intent to pursue a non-vocational objective.

Before Certifying to VA

Prior Training

■ Prior Training

- Submission of documentation showing completion of any prior training that may be a prerequisite for the course(s) being pursued
- Flight schools must obtain, review, evaluate, and grant credit for all appropriate previous education and training – regardless of VA student's possible wish to not have credit requested or granted.
- The FAA 50% and 25% rules with regard to transfer of prior Part 141 training do apply for GI Bill benefits - FAR 141.77(b)
- The request for prior training, evaluation of same, and proper application to the student's current course **must be documented**

Before Certifying to VA

Prior Training

■ Prior Training (cont.)

- Determined by Chief Flight Instructor or Assistant Chief Flight Instructor as allowed
- All appropriate training transferred must be deducted from the student's program with the hours of dual and solo flight, ground school shortened proportionately, and cost reduced appropriately

Before Certifying to VA

Medical Certificate

■ Medical Certificate

- VA student must have medical certificate valid for appropriate privileges ***on the first day of training***, prior to starting the approved Part 141 course
- Medical certificates must be:
 - Valid for ***second*** class privileges for ***all but ATP*** (38 USC 3034(d)(2))
 - Valid for ***first*** class privileges for ATP (38 CFR §21.4235(a)(3))
 - Note: This is different than the FAA requirement (third class for student pilot)
- Expiration of medical certificate or for appropriate privileges may occur during a course, but must ensure it was valid at the start of each course pursued

Before Certifying to VA

Medical Certificate

■ Medical Certificate (cont.)

- Does student meet medical certificate requirements?
 - No, and has not yet certified – Do **not** certify
 - No, has already been certified, but has *already* completed the course, then no benefits may be paid for any part of the course
 - No, has already been certified, but has *not yet* completed the course
 - Student must be officially withdrawn/disenrolled from the course
 - Obtain the appropriate medical certificate to exercise the privileges of the license or rating of which the student is pursuing
 - Re-enroll in the Part 141 course
 - VA education benefits may be paid only from that point forward
 - Yes – **Proceed** to next item on the Veteran Flight Student Checklist

Before Certifying to VA

Part 141 Certificate of Enrollment

■ Part 141 Certificate of Enrollment

- VA students must be enrolled in an approved Part 141 course
- Pilot school must issue certificate of enrollment for the specific course in which the student is enrolling or reenrolling
- Part 141 certificates of enrollment must be maintained in the VA student's file
 - Remember... files are to be maintained three (3) years from last flight or ground lesson
 - Remember... If student does not yet have a commercial pilot's license, and pursuing instrument rating, in most instances, must be simultaneously enrolled in Commercial Pilot
 - Maintain Part 141 Certificates of Enrollment for both Instrument Rating and Commercial Pilot in file

Before Certifying to VA

Part 141 Certificate of Enrollment

■ Part 141 Certificate of Enrollment (cont.)

- Does student meet the Part 141 certificate of enrollment requirements?
 - No – Do **not** certify
 - Yes – **Proceed** to next item on the Veteran Flight Student Checklist

Policies

Policies

85-15% Ratio

Before certifying to VA

■ 85-15% Ratio

- Flight schools must calculate this ratio each time a new VA student enrolls
- Flight schools must calculate this ratio each time a VA student enrolls in a new course
 - Regardless of 35% waiver
 - 35% waiver does not mean schools are not to calculate the ratio; only that the school does not have to report to their ELR on a quarterly basis

Policies

85-15% Ratio

■ 85-15% Ratio (cont.)

- Schools can only enroll a student for GI Bill® benefits if
 - No more than 85% of your students enrolled in courses approved for veterans' training, are VA/Supported students
 - Receiving VA education benefits
 - Receiving an institutional discount, waiver, scholarship, etc.
 - Calculating the 30 days prior to the veteran's enrollment
 - Each enrollment
 - Unless student has only brief breaks between courses, i.e., no more than 30 days

Policies

Calculating the 85-15% Ratio

■ How to Calculate the 85-15% Ratio

- You may use either hours of training or cost of training for the prior 30 days
- Only include students enrolled under Part 141 in your courses approved for VA training
- An 85-15% ratio calculation sheet is available
- Add up all hours/cost of training as described above for previous 30 days (A)
- Add up all hours/cost of veterans/supported students (B)
- Divide B by A to get the ratio which must be under 85%
- If the ratio is 85% or higher the student may still enroll, but you may not certify for GI Bill benefits

Policies

Ground School Modality

- **Ground School – what may and may not be approved**
 - Ground school must be actual face-to-face training with an instructor, either in a group classroom setting or one-on-one
 - Ground school offered through online training cannot be approved
 - SAA must be immediately informed if modality changes
 - Ground school may be offered through computer generated lessons, but only at the flight school with an instructor immediately available to answer questions and direct study with times recorded by the instructor
 - If a particular flight course includes online ground school that may not be approved, the flight portion of the syllabus may still be approved and paid if appropriate

Policies

Standards of Progress

■ Standards of Progress

- Like any other school approved for GI Bill training, flight schools must have and enforce standards of progress
- The SAA has certain minimum standards which are included in their recommendation to VA for final approval
- Typical standards are tied to stage checks (e.g., failure to pass two stage checks will result in termination of the student's VA education benefits)
- Records must be maintained to reflect that the student was terminated and why
- Notification of termination for unsatisfactory progress is made on the Monthly Certification of Flight Training, VA Form 22-6553c

Policies

Refunds

■ Refund Policies

- For their VA students, flight school refund policies must be pro rata
- Not a problem for 'pay as you go'
- If student pays on account then drops, the refund must be for all funds still on account that have not been applied to appropriate training already given prior to the drop
- Records must be maintained to verify that the refund was given and for the correct amount

Before Certifying to VA

Acknowledgment of Catalog/Bulletin

■ Acknowledgement of Catalog/Bulletin

- VA student is to sign acknowledgement form stating s/he received:
 - A copy of the catalog/bulletin (Proof of Issue page at end of VIB template)
 - A copy of each applicable TCO and syllabus
- Did student sign the acknowledgement form and did you maintain a copy in the student's file?
 - No – Do **not** certify

Certification Process

Certification Process

Understand the Maximum Flight and Ground School Hours

■ Maximum Flight and Ground Hours

- Each course syllabus contains minimum required flight training and ground school hours
- For VA benefits purposes, those minimum FSDO-approved hours are the maximum for which benefits may be paid
- The WEAMS report (VA Form 22-1998) reflects those maximum hours
- Preflight briefings and postflight critiques are normally not enumerated in the course syllabus
- Schools may request that pre/post may be approved, but for no more than 25% of flight hours in that course
- All pre/post must be associated with a training flight
- Pre/post must not be confused with ground school which is specific training to prepare students to take the FAA knowledge test (written exam) for that course
- When certifying enrollments, you must always distinguish between ground school and pre/post

Certification Process

Understanding Your Rates

■ Cost of Training - Rates

- Your WEAMS report (aka 22-1998) reflects the highest cost for each aircraft, FTD, simulator, ground school lesson, and pre/post training event
- While most expensive cost is listed, schools must only certify actual charges (not the maximums in WEAMS)
- VA will not pay any more than the approved maximums
- If school has rate increase and it exceeds the currently approved rate, if not submitted to the SAA, approved by the SAA and entered into WEAMS by VA, VA will only pay currently approved rate, even if school certifies actual, higher amount
 - Rate increase not finalized until WEAMS has been updated

Certification Process

Invoices and Accounts Receivable Ledgers

- **Cash Tickets, Accounts Receivable Ledgers, Invoices**
 - These are the basic documents that record all payments made for pursuit of flight courses
 - Required in order to verify that costs certified to VA for reimbursement are accurate
 - Invoices must contain the following elements
 - Name and identifying information of the student
 - Exact approved name of the course being pursued
 - Date of training
 - Flight or ground school lesson number
 - Duration of training in hours and tenths of hours
 - Aircraft flown including make, model, and tail number
 - Per hour charge
 - Total charges
 - Signature of instructor and student

Certification Process

Invoices and Accounts Receivable Ledgers

- **Cash Tickets, Accounts Receivable Ledgers, Invoices**
 - Accounts receivable ledgers must contain enough detail to list all charges, payments, and refunds
 - Payments must be detailed enough for us to see who made the payment to the school, when the payment was made, etc.
 - Student
 - VA
 - Scholarship
 - Etc.

Certification Process

Enrollment (22-1999)

■ Certifying Enrollments

- Certifications of Enrollment (VA Form 22-1999) must be sent to VA within 30 days of the first day of training or the date the veteran requests training, whichever is later
- Basic information includes
 - Full name, address and VA file number of veteran
 - Name of course as approved in WEAMS
 - First day training took place (i.e., first ground school or flight lesson)
 - Credit for prior training
 - Dual and solo flight
 - Ground school
 - Pre/post
 - Certificates and Ratings
 - Beginning date
 - Maximum hours approved for course in each category
 - Charges
 - Current Student Medical Certificate (e.g., I or II – should not be III)
 - Date of last examination
 - Full name and address of the school as approved in WEAMS
 - Name and title of the certifying official – must also be in WEAMS
 - Signature of Certifying Official and date signed

Certification Process

Enrollment (22-1999)

■ Certifying Enrollments

Type of Training

Flight

Name of Program

AIRLINE TRANSPORT PILOT- ROTORCRAFT;;

Vocational Flight Training

Credit Allowed for Previous Education and Training

Dual Solo Ground

Certificates and Ratings

Beginning	Dual	Solo	Ground	P/P Flight	Other	Charges
07/22/13	25	0	40	6.25		\$30,956.25

Remarks

Student Medical Certificate
I

Date of Last Examination
07/09/2013

Certification Process

Monthly Certifications (22-6553c)

- **Monthly Certifications of Flight Training (VA Form 22-6553c)**
 - Must be sent to VA within 30 days after the end of each calendar month of training for all but Chapter 33
 - Chapter 33 may be submitted at various times throughout the calendar month
 - Should not include information for more than one calendar month, i.e., one form per month
 - First form submitted will start with the date of first training and through the end of that month
 - Subsequent forms will be from first through end of the month - except the last cert
 - Last cert will start with the first of the month and end with the last date of training

Certification Process

Monthly Certifications (22-6553c)

■ Monthly Certifications of Flight Training (VA Form 22-6553c)

- Basic information to include
 - Full name, address and claim number of veteran
 - Period covered (dates of that month as detailed above)
 - Name of course as reflected in your WEAMS report
 - Training given
 - Make, model and horsepower of aircraft/FTD
 - Separate entries for ground school and pre/post
 - Number of hours of training in each
 - Charges per hour
 - Total charges for that equipment or training
 - At bottom total charges for all training given that month
 - Sales tax in applicable states (not for Florida, by Florida Statute)

Certification Process

Monthly Certifications (22-6553c)

- **Monthly Certifications of Flight Training (VA Form 22-6553c)**
 - Summary of Total Hours chart
 - Reflects total hours in each category approved for this veteran in this course for dual, solo, ground school, and pre/post
 - Total hours are the hours approved for the course less any credit granted for prior training
 - You also maintain a running total of training given in each category
 - Includes name and title of Certifying Official, date signed, and signature

Certification Process

Monthly Certifications (22-6553c)

■ Monthly Certifications of Flight Training (VA Form 22-6553c)

- Must be sent to VA no later than 30 days after the end of the period certified
- Also includes a block to give last date of training for when student graduates from the course, drops out of course, or is unsatisfactory for progress or attendance.

Certification Process

Monthly Certifications (22-6553c)

Monthly Certifications of Flight Training (VA Form 22-6553c)

Monthly Certification of Flight Training VA-ONCE ver.P036 - Chapter 33

VA File No. Reporting Period
 Beginning: 07/22/13
 Ending: 07/31/2013

Note Beginning date is same as that on 1999

Note Ending date is end of month as training continues into next

Student Information

Name of Current Course Completion/Termination
AIRLINE TRANSPORT PILOT- ROTORCRAFT;;

Flight Instruction Furnished for Current Course During Reporting Period

Type of Instruction	HP	Hrs	Rate	Amount
ROBINSON R22 VFR D	180	3.1	\$335.00	\$1,038.50
ROBINSON R22 IFR D	180	5.4	\$350.00	\$1,890.00
BRIEFING	N/A	2	\$40.00	\$80.00
GROUND	N/A	7.6	\$40.00	\$304.00

Student Cost For Instructions During This Reporting Period... \$3,312.50
 State and Local Taxes. (If Applicable)..... \$.00
 Total Cost to Student This Reporting Period..... \$3,312.50
 Total Student Cost Through End Of Reporting Period..... \$3,312.50

Certification Process

Monthly Certifications (22-6553c)

■ Monthly Certifications of Flight Training (VA Form 22-6553c)

Summary of Total Hours In Course Through End Of Reporting Period

Type of Instruction	Maximum Approved	Hours To Date
Dual	25	8.5
Ground	40	7.6
Solo	0	0
Other		0
Pre/Post	6.25	2

Student Medical Certificate
I

Date of Last Examination
07/09/2013

Remarks

Signature of Student on File

CERTIFICATIONS: All Provisions on VA Form 22-6553c Are Certified.

Date Signed School Information
08/01/2013

Certification Process

Monthly Certifications (22-6553c)

■ Monthly Certifications of Flight Training (VA Form 22-6553c)

Monthly Certification of Flight Training VA-ONCE ver.P036 - Chapter 33

VA File No. Reporting Period
 Beginning: **08/01/13**
 Ending: **08/22/2013**

Student Information

Name of Current Course Completion/Termination
AIRLINE TRANSPORT PILOT- ROTORCRAFT;; **08/22/2013**

Flight Instruction Furnished for Current Course During Reporting Period

Type of Instruction	HP	Hrs	Rate	Amount
Pre/Post	N/A	3.2	\$40.00	\$128.00
GROUND	N/A	3	\$40.00	\$120.00
Robinson R44 IFR D	260	10.4	\$575.00	\$5,980.00
ROBINSON R22 VFR D	180	1.5	\$335.00	\$502.50

Student Cost For Instructions During This Reporting Period...	\$6,730.50
State and Local Taxes. (If Applicable).....	\$.00
Total Cost to Student This Reporting Period.....	\$6,730.50
Total Student Cost Through End Of Reporting Period.....	\$10,043.00

Certification Process

Monthly Certifications (22-6553c)

■ Monthly Certifications of Flight Training (VA Form 22-6553c)

Summary of Total Hours In Course Through End Of Reporting Period

Type of Instruction	Maximum Approved	Hours To Date
Dual	25	20.4
Ground	40	10.6
Solo	0	0
Other		0
Pre/Post	6.25	5.2

Student Medical Certificate
I

Date of Last Examination
07/09/2013

Remarks

Signature of Student on File

CERTIFICATIONS: All Provisions on VA Form 22-6553c Are Certified.

Date Signed School Information
08/26/2013

Certification Process

Why they are important to the SAA and VA

■ Flight Training Devices (FTDs)

- Must be specifically approved for each flight course in the Part 141 FSDO-stamped TCO for Pilot Schools and the Part 142 CMO- or FSDO-stamped Flight Training Manual (general operations, courseware, training curriculum, instructor/evaluator courses, etc.) for Training Centers
- Training in FTDs is considered **dual flight** for VA purposes
- Training in FTDs may only be paid for those lessons for which the TCO or Course Training Outline (CTO) allows them to be utilized and only for the number of hours the TCO allows to substitute for dual flight lessons or for the number of lessons in the CTO

GI Bill[®] Programs

Payment of Benefits

GI Bill® Programs

Payment of Benefits/Entitlement Charge

- All payments are made based upon monthly certifications of flight training (VA Form 22-6553c) submitted by the school to VA
- Just because a Chapter 33 (Post-9/11 GI Bill) student brings you a Certificate of Eligibility that shows remaining benefits does not necessarily reflect actual circumstances
 - Student may have attended another flight school and maxed out on cap (or come close)
 - Student may have chosen an election date in error
 - Student may no longer have remaining entitlement

GI Bill[®] Programs

Payment of Benefits/Entitlement Charge

■ Chapters 30 & 1607

- Benefits payments are paid based on length of credible service
- For less than the full service required, students are eligible at a percentage of the full-time rate
- Reimburses each student 60% of the cost of training completed
 - Note: Students eligible at less than the 100% rate receive a benefit at that percentage times 60% of charges
- Payment for training to the school is between the student and the school
- Entitlement is charged at the rate of one (1) month for the amount of benefits paid that are commensurate with the full-time rate for school pursuit

GI Bill® Programs

Payment of Benefits/Entitlement Charge

■ Chapter 1606

- Reimburses each eligible student 60% of the cost of training completed
- There is no level of benefit payment for chapter 1606 – *all* payments are at the 100% eligibility level
- Payment for training to the school is between the student and the school
- Entitlement is charged at the rate of one (1) month for the amount of benefits paid that are commensurate with the full-time rate for school pursuit

GI Bill® Programs

Payment of Benefits/Entitlement Charge

■ Chapter 33 (Post-9/11 GI Bill)

- Benefits payments are paid based on length of credible service
- For less than the full service required, students are eligible at a percentage of the full-time rate
- VA reimburses each school for 100% of all *approved* charges
 - Noting that if student is eligible at less than 100%, the amount will be a percentage of the full-time rate
 - Example:
 - Student at 80% eligibility rating
 - School submitted \$1,800 related to dual flight hours and \$200 related to pre/post hours
 - If veteran has remaining entitlement and has not exceeded approved hours for the course and has not yet met the cap for the academic year, VA will pay to the flight school:
 - $\$2,000 \times 80\% = \$1,600$

GI Bill[®] Programs

Payment of Benefits/Entitlement Charge

■ Chapter 33 (Post-9/11 GI Bill – cont.)

- Academic year cap on total benefits paid for training at flight schools (currently \$12,554.54)
- Will be \$13,031.61 beginning August 1, 2017
- One VA academic year is from August 1 through July 31

GI Bill® Programs

Payment of Benefits/Entitlement Charge

■ Chapter 33 (Post-9/11 GI Bill – cont.)

- Both the monthly amount paid and yearly cap are subject to the student's level of eligibility, e.g., student eligible at the 80% level will have payments made to the school at the rate of 80% of the actual charges certified and the yearly cap is \$10,043.63 (80% of yearly cap of \$12,554.54).
- Example: Student eligible for full yearly cap. Starts and finishes CFI-A and uses \$5,000.00. Student has \$7,554.54 to use for another course or courses that (s)he starts that academic year.

GI Bill[®] Programs

Payment of Benefits/Entitlement Charge

■ Chapter 33 (Post-9/11 GI Bill – cont.)

- Academic year cap applies to ALL courses that the student starts during that particular academic year, i.e., no more than the current \$12,554.54 cap will be paid – even if the student takes more than one course in the VA academic year.
- It doesn't matter if the student finishes the course in the next academic year. The cap in effect when the course was *started* determines how much is available for that course.

How the Various GI Bill Programs Pay Benefits and to Whom

■ Chapter 33 (Post-9/11 GI Bill – cont.)

Entitlement Charge

- Most veterans have 36 months of full time benefits to use
- For vocational flight training, entitlement is charged based upon the amount paid for instruction (flight and ground)
 - The academic year cap of \$12,554.54 is divided by 12 months
 - The result is \$1,046.21
 - For every \$1,046.21 paid in total charges, the student uses one month of entitlement

How the Various GI Bill Programs Pay Benefits and to Whom

■ Chapter 33 (Post-9/11 GI Bill – cont.)

Entitlement Charge

- Example – A student in the Commercial Pilot SEL course is charged \$4,952.20 for instruction in May
 - \$4,952.20 divided by the monthly entitlement factor of \$1,046.21 (as calculated in the previous slide) results in the student being charged 4.73 months of entitlement
- Example – The same student continues to train and is charged a total of \$3,328.53 for instruction in June
 - \$3,328.53 divided by the monthly entitlement factor of \$1,046.21 results in the student being charged another 3.18 months of entitlement

In these two examples the student has flown for two months and has used a total of 7.91 months of entitlement

GI Bill® Programs

Payment of Benefits/Entitlement Charge

■ Chapter 33 (Post-9/11 GI Bill – cont.)

- Student enrolled in approved Instrument Rating and Commercial Pilot courses
 - Must be concurrently enrolled in both as required by 38 CFR § 21.4235(c)(2)
 - This does not necessarily mean the student must pursue both at the same time, although that is the recommendation of the FAA
 - Even though students must be enrolled in both courses at the same time, VA will still treat each program separately

GI Bill[®] Programs

Payment of Benefits/Entitlement Charge

■ Chapter 33 (Post-9/11 GI Bill – cont.)

- Student enrolled in approved Instrument Rating and Commercial Pilot courses (cont.)
 - Student enrolls in both Instrument and Commercial courses under Part 141 with the FAA
 - Pilot school submits a certificate of enrollment under Part 141 to the FAA as specified in 14 CFR Part 141.93 for both instrument and commercial
 - Pilot school to retain a copy of both in the student's file
 - Pilot school certifies the enrollment of the student in the instrument rating
 - In the remarks section of the VA enrollment certification, school states “Student concurrently certified to FAA for commercial pilot course under 14 CFR Part 141

GI Bill® Programs

Payment of Benefits/Entitlement Charge

■ Chapter 33 (Post-9/11 GI Bill – cont.)

- Student enrolled in approved Instrument Rating and Commercial Pilot courses (cont.)
 - Once the student actually commences training in the commercial pilot course, the school will then submit an enrollment certification to VA for that course
 - Benefits of new cap if course is started in a different VA academic year

Compliance Surveys

Compliance Surveys

- As authorized by Public Law 111-377, section 203, the SAAs will also conduct compliance surveys
- VA and SAA personnel will work in partnership to plan and coordinate the SAA compliance visit schedule and compliance activity consistent with applicable statute, regulations, manuals and procedures each fiscal year.

Compliance Surveys

- **Entrance interview**
 - With SCO and others as school or auditor sees fit
- **Review of advertising to ensure compliance with the law**
 - Samples of past 12 months of advertising (website, publications, television, and radio spots, etc.) to ensure it is not false or misleading; no promises of placement
- **Review of 85-15% ratio**
 - School documents verifying requirements of ratio were met at time of enrollment for each VA student
 - Ratio includes only students enrolled in programs approved for veterans' training

Compliance Surveys

■ Records must be available at time of visit

- Review pre-survey checklist provided to you by the SAA or VA
 - Ensure all items are addressed
 - Hard copy or electronic records
 - Check with person conducting the survey as to how they wish to see records
 - Ask questions before visit if unsure of any checklist items

■ Commencement of courses

- Will check to ensure student began when certified (first flight or ground school lesson)

Compliance Surveys

■ Course certified

- Must be same as what VA beneficiary is enrolled in and pursuing
 - Review
 - FAA certification of enrollment under Part 141
 - Enrollment agreement
 - Training and progress records
 - Cash tickets/ledgers/invoices, etc.
 - Monitor WEAMS (22-1998) reports
 - Ensure program certified is exactly as it appears on WEAMS

Compliance Surveys

■ Previous education and training

- Make available for review all flight training records from previous institutions
- Review VA forms 22-1990 and 22-1995 for any indication of any previous education and training
- Take note of previous institutions in VA ONCE
- Review school application or other documentation
- Record prior credit submitted and total granted to each part of the course (dual, solo, ground school) in the hard copy 1999 and 6553c or the BIO screen in VA-ONCE
 - Bear in mind the FAA 50% and 25% rules
- We will check to ensure that the student's course was shortened and the cost reduced appropriately

Compliance Surveys

- **Records of enrollment and flight training hours must be accurate, current and complete**
 - Follow the Flight Student Checklist that was provided to the school upon approval (it lists all items to be maintained in your files prior to certification)
 - *Note: Some schools may have their own checklist*
 - Must see ***detailed*** records of charges to student
 - Cash tickets/ledgers/invoices
 - Daily invoices are not enough
 - Must see all charges and payments

Compliance Surveys

■ Certifications must be accurate and prompt

- 22-1999: Ensure start date is accurate
- 22-6553c:
 - Ensure enrollment dates are correct (first day of training for initial monthly certification for that course and the last day of training for the final monthly certification of training for that course)
 - Ensure hours and type of training, hourly rates and total charges are accurately calculated
 - Ensure school is using one VAF 22-6553c per month, i.e., may not certify more than one calendar month on any one form/cert

Compliance Surveys

- **Certifications must be accurate and prompt (cont.)**
 - Ensure the school's first form reflects first date of training and the last form reflects last date of training (all forms in between will reflect a full calendar month*) and must not be submitted to VA until after last day of training for that month (exception made for Chapter 33)
 - Ensure the information certified on the form agrees with the school's currently approved information
 - Verify that all invoices/cash tickets are for training flights that are logged into the student's flight progress record
- *Chapter 33 submissions do not have to wait until after end of calendar month as do other chapters

Compliance Surveys

- **Certifications must be accurate and prompt (cont.)**
 - Verify that each aircraft flown/FTD/simulator used is approved for the course the student is pursuing
 - Verify that all rates charged are at or below the approved rate for each aircraft, simulator, ground school lesson, pre/post, etc.
 - Verify that progress records/cash tickets are signed by both the student and instructor
 - Verify that all invoices/cash tickets are for training flights that are logged into the student's flight progress record

Compliance Surveys

- **Certifications must be accurate and prompt (cont.)**
 - Verify that each aircraft flown/simulator used is approved for the course the student is pursuing
 - Verify that hours of preflight briefings and postflight critiques are associated with an actual flight lesson.
 - A rare exception may be made if the flight was canceled at the last minute due to inclement weather, equipment failure, unforeseen family emergency, etc.
 - All such exceptions must be documented

Compliance Surveys

- **Certifications must be accurate and prompt (cont.)**
 - Verify that the hours shown on the invoices/ledgers/cash tickets are accurate and add up the hours shown on the monthly cert (VAF 22-6553c) by make, model and horsepower of aircraft, ground school, etc.
 - Verify that the total hours shown on the monthly cert, multiplied by the rate charged, add up to the totals on that form
 - Verify that the totals for each aircraft flown, ground school lessons, etc. add up to the total shown on the 22-6553c
 - Verify that the totals to date on the bottom of the 22-6553c are accurate and reflect the approved course hours
 - Verify that the 22-6553c was submitted within 30 days of the end of the month being reported

Compliance Surveys

■ Certifications must be accurate and prompt (cont.)

Timeliness

- All certifications must be submitted within 30 days of the latter of any of the following two (2) things:
 - First flight lesson or ground school lesson
 - VA student's request for certification of benefits
- If the certification is submitted within 30 days of the veteran's request, the request must be documented in writing through a veteran's request form, detailed telephone contact form, etc.

Compliance Surveys

- **Terminations or interruptions in training must be promptly reported to VA**
 - Last dates of training must be able to be identified during a compliance survey visit and notification must be made to VA within 30 days of the student's last date of training
 - Terminations are reported on the monthly certification of flight training (VA Form 22-6553c)
 - Why is this important?
 - Flight student may attempt to begin training at another facility; VA will not pay overlapping benefits

Compliance Surveys

■ Progress and grades

- Must have adequate records
 - Training and progress records
 - Electronic records
 - Jeppesen student record folder
 - Syllabus signed off by instructor and student

Compliance Surveys

■ Attendance

- Student must be training often enough to meet the school's approved quarterly training requirement
- Records must be maintained and monitored; policies enforced
- Records should be based on actual hours of training given
- Once it is determined a student failed to meet quarterly training standards, ensure the school notifies VA of the student's failure to meet attendance standards
 - Submit a monthly flight cert (VAF 22-6553c) to terminate the student's enrollment
 - Must do so within 30 days of the student's failure to meet standards for attendance
 - If probation, notify VA to ensure student receives assistance letter from VA (verifying this item)

Compliance Surveys

■ Satisfactory progress

- Must promptly report to VA when satisfactory progress is not made
 - Student pursuing lessons at such a slow pace that s/he cannot complete in approved number of hours
 - Student failed one or more stage checks

■ Charges

- Hourly charges for training for VA beneficiaries must be the same or less than charges to other similarly circumstanced students
 - Monitor courses and charges for non-VA students
 - Some non-VA files will be randomly selected for this purpose
 - Authority: Title 38 USC, Section 3690(c)

Compliance Surveys

- **Certain information must be furnished to students**
 - Copy of course syllabus, schedule of tuition, fees and other charges, as well as regulations pertaining to attendance, grading policy, conduct, and of rules and operation
 - School's VA student catalog/bulletin
 - Acknowledgment form/Proof of Issue is mandatory
 - To ensure issuance
 - Student must sign and date; copy maintained in student file

(38 CFR §21.4254(c)(5) Nonaccredited courses; approval criteria.)

Compliance Surveys

■ Pro rata refund policy

- Must be in place and enforced
- Mandatory for all nonaccredited courses
- If not pro rata, then it must be more advantageous to VA student than if pro rata
 - Must be pro rata to the very end
- Applied to payments on account – refund must be tied to all funds student has paid on account (less any training the student completed)

(38 CFR §21.4255 Refund policy; nonaccredited courses.)

Compliance Surveys

■ Licenses and ratings

- School records must show, *prior* to enrollment, that VA beneficiaries held an unlimited private pilot's license (or higher rating as applicable)
 - Follow VA Flight Student Checklist and ensure appropriate copies of licenses are maintained in the files for a minimum of **three (3)** years following the end of each enrollment period in accordance with 38 CFR §21.4209.

(38 CFR §21.4263 Approval of flight training courses)

Compliance Surveys

■ Medical certificates

- School records must show that VA beneficiaries held a current medical certificate of the appropriate class and valid for the appropriate privileges on or before the date the student started the course/program
 - Follow Flight Student Checklist...
 - If not valid at start of course, a debt will be created for entire course pursuit (see previous slide for process to dis-enroll and re-enroll)

(38 CFR 21.4263 Approval of flight courses.)

Compliance Surveys

- **Payment of cost of training – are all students paying their appropriate share?**
 - School records must show that VA beneficiaries are paying their share of the cost of training received and that non-VA students are paying 100% of the cost of training received
 - School ledgers must be detailed enough to include dates of each flight/ground school lesson, aircraft flown, duration of flights and lessons, unit cost, total cost, **source of payment** for each lesson, etc.
 - Records must reflect that students under chapters 30*, 1606 and 1607* paid their 40%* share of the course

*Percentage is relative to eligibility rating.

Compliance Surveys

■ Repeat discrepancies

- Records will be reviewed to ensure the school has corrected and did not repeat any discrepancy found during the prior survey – other than an occasional clerical error.
- Approval status may be in jeopardy

Compliance Surveys

- **Power of attorney – strictly prohibited**
 - Records are reviewed to ensure school has neither a direct nor indirect PoA over any VA education payments to the student
 - If found, may be cause for school's instant withdrawal of approval to train veterans
 - Ensure that, if veterans' checks come to your school address, you immediately hand them over to student with no strings attached
 - An indirect PoA (prohibited) is where VA checks are deposited into a joint student/school bank account to which the school has access to the funds therein

Compliance Surveys

- **VA Form 22-1919 for proprietary schools**
 - Form provided to school to complete
 - Usually provided during entrance interview or sent via email, in advance, to obtain during survey visit
 - To be signed by president or chief administrative official of school
 - Reviewed to ensure there are no conflicting interests
 - For-profit proprietary: Neither VA nor SAA personnel may own any interest or work for your school
 - All proprietary: Owners, officers, and SCOs may not use their own GI Bill® benefits to attend their school
 - Know who your students and employees are

Compliance Surveys

■ **Nonduplication of benefits**

- Precautions are taken to ensure veterans are not using more than one federal program at the same time
- Veterans may not use the Government Employees Training Act or active duty tuition assistance for the same course for which the student is receiving GI Bill® benefits
 - Monitor and review each student's ledger to ensure duplicate payments from other inappropriate sources are not being made.

Compliance Surveys

- **Once the compliance survey visit is complete – still at the school**
 - Exit interview/debrief will be conducted
 - With SCO and others as school or auditor sees fit
 - Site visit report – addresses findings
 - Given to school at time of visit (school keeps original; SAA or VA receives copy)
 - If corrective payment/award action is required, i.e., something impacts payment of benefits, ‘referrals’ will be submitted to the VA Muskogee Regional Processing Office for corrective award action
 - Other action items also listed
 - Timeframe in which school is expected to complete

Compliance Surveys

- **Once the survey is complete – auditor has returned to the office**
 - A formal letter is sent to the school (to the highest administrator, with copy to the SCO, if different)
 - Acknowledge the recent visit
 - Identify student records reviewed
 - Detail findings/discrepancies
 - Specify corrective action (if any) required by the school

Compliance Surveys

■ Findings/Common Errors (in no particular order)

- Hours certified to VA do not match up with training records
- Hours for one month were combined with another
- Dates certified to VA do not reflect actual beginning of training (first ground school or flight lesson)
- Rates certified are maximum approved instead of actual charges
- Aircraft/rates certified to VA are not approved and not reflected on WEAMS approval form
- Pre/post lumped into or interchanged with Ground School
 - Not the same – completely different categories of certification and maximum hours
 - If not already approved, flight school may request approval of amount up to 25% of flight
- Appropriate medical certificate not obtained and/or maintained in file
- Documentation of training, billing, licenses, certificates, grades, etc. not maintained for three (3) years from last day of training

Miscellaneous

Miscellaneous Websites

FAA Approval

■ FAA websites

- FAA FSDO search:

http://www.faa.gov/about/office_org/field_offices/fsdo/

- FAA CMO search:

http://www.faa.gov/about/office_org/field_offices/cmo/

- FAA Pilot School search:

<http://av-info.faa.gov/PilotSchool.asp>

- FAA Training Center search:

<http://av-info.faa.gov/TrainingCenter.asp>

■ Registration

- FAA Registry and Aircraft Inquiry search:

■ <http://registry.faa.gov/aircraftinquiry/>

Questions?



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