



FLORIDA DEPARTMENT OF VETERANS' AFFAIRS

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*Honoring those who served U.S.*

## State Approving Agency for Veterans' Education and Training

### Advanced Training Workshop

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# Training Topics

- SAA and VA Functions
- Program Approval Process
- WEAMS Reports
- Chapter 33
  - Tuition and Fees
  - Yellow Ribbon (YR) Program
  - Entitlement
- Common Discrepancies
- Miscellaneous
  - Reporting Fees
  - Reporting Probation, Suspension and Graduation

# SAA Functions

- Promote and safeguard quality education and training programs for veterans
- Ensure greater educational opportunities to meet the needs of veterans
- Assist VA in preventing fraud, waste and abuse in the administration of the GI Bill
- Approve programs for VA educational benefits
- Ensure compliance with established standards

# VA Functions

- U.S. Department of Veterans Affairs (VA) administers federal programs nationwide for veterans and is responsible for the payment
- Answers questions regarding payment, entitlement as well as rules, policies and procedures

# Approval Process

- SAA and VA Jurisdiction
  - Effective August 1, 2011, Section 203 of Public Law 111-377 (Post-9/11 Veterans Education Assistance Improvement Act of 2010) resulted in a change in the approval process for certain facilities
  - Deemed certain programs of education to be approved for the purposes of VA education benefit programs
    - Standard degree programs at Accredited Public and Proprietary Not-for-profit (NFP) IHLs
    - Catalogs, addenda and requests for new or modified NCD programs were submitted to VA instead of your SAA

# Approval Process

- SAA and VA Jurisdiction
  - Effective October 1, 2013, VA returned approval authority for NCD programs at the accredited public and NFP proprietary IHLs to the SAAs
  - Letter to school from the Department of Veterans Affairs
  - Submit the following to your SAA:
    - Catalogs
    - Requests for approval of any new, removed or modified NCD programs
    - Requests for approval of any new or modified standard college degree program offered ***under contract*** (e.g., AS, Professional Pilot Technology)

# Approval Process

- SAA and VA Jurisdiction
  - Submit changes in the following to your SAA:
    - Accreditation
    - Name
    - Change of ownership
    - Change of address
    - Policy
    - Closure
  - The above also applies to accredited public and NFP IHLs with only standard college degrees
  - Remember... 30 days is the magic number for compliance

# Approval Process

- SAA and VA Jurisdiction
  - In a nutshell...

VA
Flight training approved by FAA offered by facility with valid/current pilot school air agency certificate (i.e., courses under Part 141, with exception of private pilot)
Apprenticeship program(s) registered with the Department of Labor (DoL) or State Agency recognized by the Office of Apprenticeship
Programs that lead to a secondary school diploma offered by a secondary school approved in the state in which it is operating (Public High Schools)
Licensure test(s) offered by a federal, state or local government
SAA
All others



# Approval Process

- SAA follows same process as before for all but Flight Schools, Registered Apprenticeships, Public High Schools and Licensing & Certification Agencies
  - After review of catalog, addenda, etc. and approval of programs, policies, etc., letter generated to:
    - School or job training establishment (JTE)
    - Copy to ELR along with copy of catalog and other supporting docs
  - ELR accepts approvals for VA and updates WEAMS
  - Copy of WEAMS report goes to school or JTE
    - Do not certify new programs until you know VA has updated WEAMS

# Approval Process

- Visits Conducted by SAA
  - New/inspection visits: all schools (including flight) and job training establishments
  - Change of ownership
    - Required if substantial (i.e., physically moved to different facility as opposed to just change in mailing address)
  - Change of address
    - Same as change of ownership
  - Compliance surveys
  - Technical assistance
  - VA requested

# Approval Process

- Processes described are typical; however, ELR and SAA may have other or different processes in place
- Do not hesitate to contact your ELR or SAA with questions

# WEAMS Report

- WEAMS Report (aka VA Form 22-1998)
  - What does it stand for?
    - Web Enabled Approval Management System
  - What is it used for?
    - To store SAA and VA approval information
    - Reviewed by the Veterans' Claims Examiners (VCEs) after each claimant's eligibility is established and they receive an enrollment certification from the school
  - When is it generated?
    - Sent to schools and JTEs when:
      - There are revisions to an approval
      - A new school or JTE receives initial approval

# WEAMS Report

- WEAMS Report (aka VA Form 22-1998)
  - Do you know how to read it?
    - Handout included “How to Read a WEAMS ... Report”
      - Addresses the fields on the report
  - Contact VA if you notice an error

# Post-9/11 GI Bill (Chapter 33)

## Tuition and Fees – Public, Tax-supported IHLs

Effective August 1, 2011, payments were limited to:

The net charges for tuition and fees for an in-state student at a public university/college. This means VA will pay up to the full net tuition and fees for all in-state public IHL students.

- Schools are to certify only the in-state portion of the tuition and fees – even for out-of-state students
- Net charges exclude:
  - Any waiver or reduction in tuition and fees
  - Any scholarship or other federal, state, institutional or employer-based aid or assistance (other than Title IV funds) that is provided directly to the institution and specifically designated for the sole purpose of defraying tuition and fees

# Post-9/11 GI Bill (Chapter 33)

## Net Tuition and Fees

The amount of tuition and fees certified to VA by the school must be reduced by the amount of any other payments made to the school for the sole purpose of paying for tuition and fees (with the exception of Title IV funds)

Examples include, but are not limited to:

- ROTC Scholarship payments (designated for tuition and fees)
- Tuition Assistance (TA) from the Reserves and National Guard
- MYCAA
- Purple Heart Waiver
- Employer scholarship paid to the school specifically for T&F

# Post-9/11 GI Bill (Chapter 33)

Effective October 1, 2011:

- VA began paying Chapter 33 benefits to individuals pursuing the following approved non-IHL, non-degree courses/programs:
  - Non-College Degree (NCD) programs
  - On-the-job Training (OJT) and Apprenticeship programs
  - Vocational Flight School courses/programs
  - Correspondence courses
- Active duty members became eligible to receive the book stipend
  - Active duty members are still not eligible to receive the monthly housing allowance (they still receive their housing allowance from the military)



# Post-9/11 GI Bill (Chapter 33)

**Fees:** *The mandatory/required charges (other than tuition, room and board) applied by the school for pursuit of an approved program of education.*

## 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 pre-admission fees)
- Books\*
- Fees for food/lodging
- Penalty fees (late registration,  
late course changes, etc.)

*\*See Fees for Books and Supplies Handout for this and other detailed guidance – and contact your ELR if you have any questions about allowable fees*

# Post-9/11 GI Bill (Chapter 33)

## Tuition & Fees – Stand-alone NCD and Proprietary Schools

- For the current VA academic year (August 1 through July 31), VA pays the net charges for tuition and fees up to \$19,198.31.
  - Effective August 1, 2011/October 1, 2011: \$17,500.00 per academic year
  - Effective August 1, 2012 this increased to \$18,077.50 per academic year.
- Net charges **exclude** any waiver or reduction in tuition and fees and any scholarship, or other Federal, state, institutional, or employer-based aid or assistance (other than Title IV funds) that is provided directly to the institution and specifically designated for the sole purpose of defraying tuition and fees.
- In practice, this means VA will pay the full net cost of tuition and fees (as described above) until a total of \$19,198.31 has been paid. For those persons not eligible at the 100% level, VA will still pay the appropriate percentage of all tuition and fees, and the yearly cap will be reduced by the benefit level of the veteran. For example, for a veteran eligible at the 90% level, VA will pay 90% of tuition and fees up to \$17,278.48 per academic year.

# Post-9/11 GI Bill (Chapter 33)

## Tuition & Fees – Stand-alone NCD and Proprietary Schools

- Remember the following potential issues...
  - A student may meet their cap for the VA academic year at another institution (cap is not reset when a student attends a new institution)
    - Just because they bring in a Certificate of Eligibility doesn't guarantee they have remaining funds
  - A student may have exhausted his/her entitlement or the delimiting date may be up

# Post-9/11 GI Bill (Chapter 33)

## Tuition & Fees – Stand-alone NCD and Proprietary Schools

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

# Post-9/11 GI Bill (Chapter 33)

## NCD

- A Monthly Housing Allowance is prorated by the rate of pursuit, benefit level and number of days in the month the student was enrolled (i.e., no interval pay)
- A lump-sum Books & Supplies stipend in an amount equal to \$83 for each month (prorated for partial months and benefit level)

# Post-9/11 GI Bill (Chapter 33)

## Monthly Rates – OJT/Apprenticeship Programs

Individuals pursuing an approved OJT or Apprenticeship program will receive the following

- Keeping in mind each monthly rate will be prorated for benefit level and/or less than 120 hours per month)

Training Period	Monthly rate
First six months of training	100% of your applicable MHA
Second six months of training	80% of your applicable MHA
Third six months of training	60% of your applicable MHA
Fourth six months of training	40% of your applicable MHA
Remaining pursuit of training	20% of your applicable MHA

# Post-9/11 GI Bill (Chapter 33)

## OJT/Apprenticeship Programs

- A lump-sum Books and Supplies stipend in an amount equal to \$83.00 for each month (prorated for benefits level, partial months and/or less than 120 hours per month)

# Post-9/11 GI Bill (Chapter 33)

## Training Costs – Flight

- VA will pay the flight school up to 100% of the student's net costs for approved courses (dual, solo, pre/post and ground if approved as part of course)
  - Payments for students eligible at lesser levels will be proportionately smaller and their maximum per year proportionately smaller
- Students may receive the books stipend, but not the housing allowance
- Payments of training costs are certified to VA the same as before
  - Payments will then be made, by VA as they receive each VAF 22-6553c, to the school and not the veteran



# Post-9/11 GI Bill (Chapter 33)

## Tuition and Fees – Adjustments

- When submitting a reduction to VA for a Chapter 33 student, you must report the tuition and fees for the reduced number of credits (i.e., what the tuition and fees amount would have been had the student only been in that many hours to begin with)
  - This is regardless of whether the student does or does not owe money to the school

# Post-9/11 GI Bill (Chapter 33)

## Tuition and Fees – Flat Rate

- Schools that charge flat rate tuition must also report the net tuition and fees
- When a student is enrolled in modulated terms (i.e., mini sessions within the standard term), the net tuition and fees should be associated and reported with the first credits that total the minimum number of credits required to be a full-time student at the school

# Post-9/11 GI Bill (Chapter 33)

## Tuition and Fees – Flat Rate

**Question 1:** How should schools with flat rate tuition certify **enrollment** for Chapter 33 claims during modulated terms?

**Answer:** Schools with flat rate tuition should certify modulated terms by first dividing the total tuition charged by the minimum number of hours considered full-time (usually 12). They should then multiply that per credit hour cost by the number of hours of enrollment for each modulated term (until the full-time hours are reached) and certify the results. No tuition should be certified for subsequent hours pursued

# Post-9/11 GI Bill (Chapter 33)

## Tuition and Fees – Flat Rate

### Example 1:

VA College charges a flat rate of \$6,250.00 per semester for each individual pursuing between 12 and 18 credit hours. Each semester has 3 five-week terms

$(\$6,250.00 / 12 = \$520.83 \text{ per credit hour})$

Spring Semester	Credit Hours Enrolled	Tuition Reported
Term 1	9	\$4,687.50
Term 2	3	\$1,562.50
Term 3	3	\$0.00

# Post-9/11 GI Bill (Chapter 33)

## Tuition and Fees – Flat Rate

**Question 2:** How should schools with flat rate tuition certify **fees** for Chapter 33 claims during modulated terms?

**Answer:** If the school also has a flat rate fee schedule, it should be divided up just as the flat rate tuition is divided in Example 1. However, if there are additional fees associated with individual courses, they should be certified during the term the course is attended.

# Post-9/11 GI Bill (Chapter 33)

## Tuition and Fees – Flat Rate

### Example 2:

Same details as Example 1; however, this college charges a flat rate of \$600 in fees each semester and the student is enrolled in a class in Term 3 that also has a lab fee of \$100

Spring Semester	Credit Hours Enrolled	Tuition Reported	Fees Reported
Term 1	9	\$4,687.50	\$450.00
Term 2	3	\$1,562.50	\$150.00
Term 3	3	\$0.00	\$100.00

# Post-9/11 GI Bill (Chapter 33)

## Tuition and Fees – Flat Rate

**Question 3:** How should **Private** schools with flat rate tuition certify **Yellow Ribbon** for Chapter 33 claims during modulated terms?

**Answer:** The school can only certify YR for the terms where the annual cap has been exceeded

# Post-9/11 GI Bill (Chapter 33)

## Tuition and Fees – Flat Rate

### Example 3:

Same details as Example 1 above; however, this student has been certified for \$16,000.00 in tuition during previous terms. The annual cap for this year is \$19,198.31.

Spring Semester	Credit Hours Enrolled	Tuition Reported	Unmet Charges	Maximum Reportable YR
Term 1	9	\$4,687.50	\$1,489.19	\$744.60
Term 2	3	\$1,562.50	\$1,562.50	\$781.25
Term 3	3	\$0.00	\$0.00	\$0.00



# Tuition Assistance

- **Non-Chapter 33**

- Active duty members submit their TA form to the RPO to claim the difference between the charges for their courses and the amount covered by TA (Tuition Assistance Top-up aka TATU)
  - Schools should not certify any courses paid for by TA

- **Chapter 33**

- School treats the TA as any other scholarship and waiver and deducts the amount of the TA from the total charges certified to VA

NOTE: Show the course name in Remarks for any Chapter 33 students using tuition assistance

# IHL

## Equivalent Credit Hours

Undergraduate training time always based on:

- 12 credits = full time
- 9 credits = three quarter time
- 6 credits = half time
- For chapter 33, rate of pursuit is determined by dividing the number of credits being pursued by 12, e.g., 7 credits being pursued divided by 12 = a rate of pursuit of 58%
- For graduate study under chapter 33, rate of pursuit is determined by dividing the number of credits being pursued by the number of credits that the school's standards equate to full time, e.g., where 9 credits = full time, 6 credits pursued = a rate of pursuit of 67%

# NCD

## Correct Hours to Certify

- Certify the actual number of clock hours per week the student is ***scheduled*** to attend, not the minimum it takes to be full-time
  - Certified hours will be compared with those listed on the enrollment agreement and schedules
  - No averaging unless it does not change training time or rate of pursuit

# NCD

## Attendance Policy

- Know, understand, monitor and enforce your SAA approved attendance policy (often different than policy for your other students)
- Policy for VA students may be a percentage of course hours or total number of absences for a specific period
  - Must be a definite point in time a student's VA benefits are terminated for failure to meet attendance standards

# NCD

## Attendance Policy (cont.)

- Maintain detail in file
  - We must see a record of every day the student was scheduled; the number of hours per day s/he was scheduled; and how many hours the student actually attended
    - Must be a daily record of the student's actual attendance
  - Excused absences must be documented
  - Ensure the name of the course, times, dates, etc. are listed on the record
  - All NCD programs measured on a clock hour basis must maintain attendance records for each class
  - A student's schedule is not an attendance record and not sufficient for this purpose

# NCD

## Attendance Policy (cont.)

- Enforce the policy if a student fails to meet the standards
  - Student's benefits must be terminated if s/he violates attendance standards
- Ensure you submit within 30 days of the student's last day of attendance prior to violating the attendance policy

# NCD

## First (and Last) Dates of Attendance

- Amend vs. Terminate
  - The starting date of a student's enrollment 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
      - Impacts payment for all chapters since there is no longer interval (break) pay

# NCD

## First (and Last) Dates of Attendance

- Amend vs. Terminate
  - If the student's enrollment is terminated for any reason, the last date of attendance must be reported to VA
    - Unsatisfactory attendance or progress
      - Termination date to report to VA is the last day the student was in class prior to violating the attendance or SAP policy
    - Class or program finished early
      - Maintain documentation as to why the student finished early



# NCD

## Credit for Prior Training – Must be Obtained

- Schools must ask students to list all previous education and training
  - To include where they attended, when they attended and what program(s) they were enrolled in
  - Do not ask the student if s/he wants any credit transferred in – that is irrelevant
- Schools must evaluate the education and training
  - Must obtain official transcripts
    - Regardless of whether student previously utilized VA education benefits

# NCD

## Credit for Prior Training – Must be Obtained (cont.)

- In most instances, schools must receive all transcripts:
  - Within two (2) semesters or the equivalent
  - Within 12 weeks if the program is at least six (6) months long
  - Prior to the start of the course if less than six (6) months long
- If applicable, schools must grant credit and reduce training time proportionately
  - Notify student and retain in student's records

# NCD

## Cooperative Training Criteria

- Must always be full-time
- Classroom segment must be at least as long as on-the-job portion
- Alternating coop – alternates full-time periods of classroom and on-job
- Parallel coop – students go to class half-time and on-job half time
  - Classroom time can be more than on-job portion, but not vice versa

# NCD

## Alternating Coop Example

- Student is enrolled full-time in Small Gas Engines  
August 28 – December 15, 2013 @ 25 hours per week
- The school places him in coop job for the period  
January 3 – April 20, 2014 @ 40 hours per week

*This meets the requirements because both periods are full-time and the classroom period is at least as long in length as the job training period*

# NCD

## Parallel Coop Example

- Student enrolls for period August 27, 2013 – Dec. 15, 2013 in Small Gas Engines @15 hours per week in a class and 20 hours per week on the job

*This meets the requirements because the student is going at least half-time in the classroom and half-time on the job*

# NCD

## Approved Course/Program Length - Certification

- Must not certify more hours than the SAA has approved
  - VA will only pay for the student's derriere to be in the seat in the classroom for the number of clock hours approved
- Keep track of the total hours completed

# NCD

## Pro Rata Refund Policy for Non-accredited Courses/Programs

- The refund policy must be pro rata or more advantageous to VA students than pro rata
  - Must be pro rata to the very end!
- Example:
  - Student drops out after completing 75% of the course
  - The school must refund 25% of the tuition to the student
- An accredited school could possible have a non-accredited program to which the pro rata refund rule would apply

# Flight

## Maintaining Approval

- Must maintain current FAA Air Agency Certificate and Letter of Authorization under Part 63, 141; or Training Certificate under Part 142. Notify VA of changes in aircraft & ground training rates, instructors, aircraft inventory, changes to TCOs & syllabuses
- Keep copies of all records for at least three years after each veteran's last date of training (different than FAA requirement)
- Suggestion: Request approval of aircraft hourly rates at least 10% to 20% higher than actual current charges (VA will pay rates up to or less than that rate)
  - Certify to VA **actual** charges (this obviates the need for requesting the approval of new rates every time your fuel and insurance costs go up)



# Flight

## Medical Certificates

- For all courses except ATP, medical certificate valid for second class privileges is required
- For ATP, a medical certificate valid for first class privileges is required
- First class medical certificate valid for **first** class privileges for 6 months after medical exam and is valid for **second** class privileges for 12 months after medical exam
- VA students must start each course with the appropriate medical certificate as noted above
  - OK if medical certificate expires for the appropriate privileges during a particular course

# Flight

## Medical Certificates (cont.)

- VA students must start each course with the appropriate medical certificate as noted above. It is not a problem if a medical certificate expires for the appropriate privileges during a particular course; however, the student must again obtain the appropriate medical certificate before starting the next license or rating.
- If student did not have a valid medical certificate at the start of the course, an overpayment will be made for the entire course pursuit – *even if* the student acquires an appropriate medical certificate during the course

# Flight

## Pilots' Licenses

- VA cannot pay benefits for a private pilot's license at a vocational flight school
- Students must have been issued their private pilot's license before they may begin their VA training
- VA students must either enroll concurrently in Commercial & Instrument courses or already possess an Instrument Rating
- Beyond Commercial & Instrument, the student must possess the appropriate license and amendments to exercise the privileges of the rating being pursued
- To pursue an ATP, VA students must already have logged the appropriate 1,500 hours required to exercise the privileges of an ATP (a recent exception was instituted by the FAA, but it only applies to flight programs at certain colleges)

# Flight

## 85-15% Ratio

- No more than 85% of students in a school's VA approved courses can be receiving GI Bill benefits
- This ratio includes all students in all courses approved for VA benefits combined, not by individual course
- This ratio does not include part 61 students
- As long as the school's overall part 63, 141, 142 enrollment does not exceed 35%, that school does not have to report the ratio to VA (The 35% is a head count)
- If more than 35% of students are VA, then the school must determine the ratio each time they enroll a new VA student
- Ratio is calculated using the hours flown or fees paid for the 30 days prior to each veteran's enrollment (***sample worksheet and instructions provided***)

# Flight

## Items We Will Review

- All VA student files with applicable records, which include:
  - Progress records for each student – including a record of each flight with lesson number, make/model/tail number of aircraft, hours flown, maneuvers accomplished, evaluation of student's performance, signed by student and instructor
  - Financial records for each student, including invoices and payment records
- Aircraft and simulators listed in the aircraft inventory and catalog
- Evidence that the policies written in your current catalog are enforced
- Verification that the catalog meets all requirements listed in the application
- Current FAA Part 141 Air Agency Certificate and Letter of Authorization or Part 142 Training Certificate

# Flight

## Items We Will Review (cont.)

- Copies of any agreement or contract with another facility that provides flight or ground training
- School application for training or enrollment agreement/contract
- Prior credit – Note: Under FARs, a Pilot School may apply credit from another certificated school hour for hour, but up to no more than 50% of curriculum as outlined in the syllabus for their course
- VA Forms
- Flight Training Record
- Invoices/Cash Tickets
- Other documents
  - Enrollment contract
  - Licenses and medical certificates
  - Certification of enrollment under FAR part 141 or part 142
  - Student's receipt of catalog

# Flight

## Items We Will Review (cont.)

- Advertising folder
  - Containing samples of all advertising used by the school in the past year
- School documents verifying that the requirements of the 85-15% ratio were met at the time of enrollment for each VA student
  - Not applicable to military aero clubs

*(See sample 85-15% Ratio spreadsheet)*

# Flight

## Forms Completion (VA Form 22-1999)

- Are you using VA-ONCE?
- Name of Program must be exactly as approved by VA (see your WEAMS report)
- Date Training Began must be the first day of actual flight or ground school, whichever occurs first
  - Do not use the date the student signed a contract unless it is the first day of actual training
- Licenses & Ratings Held must reflect the highest attained by the student
- Hours in the Course are the approved hours, less any credit for prior training
- Total Charges are the remaining hours to be taken after credit has been given times the appropriate hourly rates



# Flight

## Forms Completion (VA Form 22-6553c)

- One form per calendar month (i.e., may not certify more than one calendar month on any one form)
- First form will reflect the first date of training and the last form will reflect the last date of training. All forms in between will reflect a full calendar month (e.g., September 1-30, and may not be signed and submitted to VA until after the last day of training for that month)
- Hours and amounts certified are based on cash tickets/invoices signed by the student & instructor
  - Do not send cash tickets with 6553c forms.
- Information certified on the form must agree with the currently approved information for your school

# Correspondence Courses

Individuals enrolled in an approved program of education pursued exclusively by correspondence will receive up to:

- The actual **net** cost for tuition and fees not to exceed \$9,324.89 for the current VA academic year
- Benefit payments will be issued quarterly for courses completed

# Yellow Ribbon Program

## Yellow Ribbon Program Eligibility

Only individuals entitled to the 100% benefit level are eligible for Yellow Ribbon (YR) funding.

- YR is **not** available to:
  - Active duty members or their spouses using ToE while the transferor is on active duty
  - NCD schools and other non-degree granting facilities

# Yellow Ribbon Program

## Yellow Ribbon Agreement

- IHLs may voluntarily enter into an agreement with VA to fund tuition and fees costs that exceed either 1) the in-state tuition and fees at a public IHL; or 2) tuition and fees charged over and above the yearly academic cap (\$19,198.31 for August 1, 2013 – July 31, 2014)
- First time applicants – schools must complete an initial YR contract
  - Specifies the total amount of money the school is willing to waive, how much per student and specifies if any divisions of the school will not participate
- YR contracts are open-ended agreements (i.e., a contract for the current year and all subsequent years unless VA or the school notifies the other party of their desire to change the contract)
- NOTE: Withdrawal from participation and/or the submission of changes will only be allowed during the “open season” period from March 15 – May 15 of each year ([yellow.ribbon@va.gov](mailto:yellow.ribbon@va.gov))

# Yellow Ribbon Program

## Yellow Ribbon Agreement

- Funds used must be unrestricted and at the full discretion of the school for use
- A donation or grant to the school to provide assistance to veterans may not be used for YR
- A school cannot waive more than 50% of the unmet costs for T&F
  - You must not show an amount for more than half of the unmet tuition and fee costs

# Yellow Ribbon Program

## Yellow Ribbon - Payments

### Example 1:

- At a public school, in-state tuition is \$150 per credit hour
- Student charged out-of-state tuition at \$400 per credit hour
- Student pursues 12 credit hours for the Fall semester
- Net T&F for Fall semester           \$4,800.00
- VA pays the school \$1,800.00 (12 x \$150/credit hour)
- Of the remaining unreimbursed tuition of \$3,000.00, the school waives \$1,500.00 and VA pays the school \$1,500.00 under YR
- If the school happened to only waive \$1,000.00, then VA would only pay \$1,000 leaving the student to pay the remaining \$1,000.00

# Yellow Ribbon Program

## Yellow Ribbon - Payments

### Example 2:

- Proprietary for-profit school (cap is \$19,198.31)
- Net T&F for the Fall term           \$15,000.00
- Net T&F for the Spring term       \$20,000.00
- Total for VA academic year       \$35,000.00
- VA pays the full T&F \$15,000.00 for the Fall term
- VA pays T&F of \$4,198.31 (\$19,198.31 cap - \$15,000 paid from Fall term)
- $\$35,000.00 - \$19,198.31 = \$15,801.69$  of unmet T&F
- $\$15,801.69 / 2 = \$7,900.85$  (amount VA will pay)
- School enters \$7,900.85 on the Spring cert and deducts that amount from the student's bill once the school receives the \$7,900.85 YR from VA

# Post-9/11 GI Bill (Chapter 33)

## Entitlement Charge – Public and Proprietary IHLs

- Students attending will be charged one (1) month of entitlement for each month VA pays the housing allowance at the 100% rate of pursuit
- Students at less than 100% rate of pursuit will have their entitlement prorated appropriately



# Post-9/11 GI Bill (Chapter 33)

## Entitlement Charge – NCD

- Standalone NCD:
  - Students will be charged entitlement based upon the tuition and fees paid
  - For every \$19,198.31 paid (VA Academic Year cap for 2013) for students at the 100% level of eligibility, VA will charge 12 months of entitlement
    - Equates to one day of entitlement for every \$53.33 VA pays
      - $\$19,198.31 / 360 \text{ days} = \$53.33$
      - VA computers calculate every month as 30 days in length
    - Entitlement can be exhausted quickly at schools who have accelerated courses at a higher tuition and fees rate

# Post-9/11 GI Bill (Chapter 33)

## Entitlement Charge – Flight

- If a student is eligible at the 100% level, VA will pay \$10,970.46 for the academic year beginning August 1, 2013. If they have less than one year of entitlement (not delimiting date) remaining, then they have less than \$10,970.46 available.
- For every \$914.21 VA pays, the student uses up one month of entitlement. That means a student who has, for example, only 6 months of entitlement remaining, will only have \$5,485.23 available to use even if their delimiting date is 10 years away.
- A student eligible at the 80% rate, for example, has only \$8,776.37 to use each year and uses up one month of entitlement for each \$731.36 paid on their behalf.

# Common Discrepancies

## IHL

- The number of credits certified to VA is incorrect – or the credits are placed in the wrong column in VA-ONCE
- Program is incorrectly annotated on the certification of enrollment
- A successfully passed course is repeated
- Withdrawals/adjustments not reported to VA in a timely fashion (sometimes, not at all)
- Tuition and fees not correctly reported (including when there is a reduction in number of credits)
- Courses certified that are not part of the program pursued
- Previous education and training not obtained, reviewed
- LDAs incorrect or not reported (includes Unearned/Walkaway F grade)
- Public schools not certifying full net charges (e.g., student eligible at 80% and school certified the 80% amount – results in underpayment)

# Common Discrepancies

## NCD

- Start date not amended if student does not begin on date certified
- Last date of attendance (LDA) not reported
  - NCD program certifications must begin and end with an actual day of attendance
- Programs/courses approved in clock hours or those that do not lead to a standard degree are being certified when taught in whole or in part via independent study
- Attendance policy is not being enforced
- Previous education and training not obtained or evaluated
- Clock hours certified exceed approved hours
- Tuition and fees not accurately reported to VA

# Common Discrepancies

## OJT/Apprenticeship

- Changes of ownership not being reported
- Trainee attends only a few hours at the tail end of one month. Instead of submitting those hours in the month in which they belong, they were lumped in with the next month's VA Form 22-6553d
- Bi-weekly payroll ending dates were being used as the cut-off for the hours as opposed to the actual hours for the entire month
- Apprentice stops training, but the termination is not reported to VA

# Common Discrepancies

## Flight

- Appropriate medical certificate not obtained and/or maintained in file
- Hours and rates certified to VA do not match school invoices and other training and financial records
- Aircraft shown on the monthly certification form (VA Form 22-6553c) are not approved (monitor WEAMS report)
- Records (documentation of training, billing, licenses, certificates, grades, etc.) not maintained for three (3) years after last day of training
  - Different than FAA requirement of one (1) year retention
- Ground school taught in an independent study format
  - Approval of ground school must be withdrawn
- Incorrect reporting of first day of training
- Ground school lumped in with pre/post

# Miscellaneous

## Reporting Fees

### *Are the reporting fees being appropriately maintained/spent?*

- Effective August 1, 2011, VA requires all reporting fees are to be used exclusively in support of school efforts to certify the enrollment of their VA students. This restriction allows those funds to also be used for SCOs to attend VA and other VA-specific training conferences

## Guidance

- Be sure you have accounted for the reporting fee check, when it was received, and be able to account for the proper expenditure of those funds (*see handout*)

# Miscellaneous

## Reporting Probation, Suspension and Graduation

### Probation

- Promptly notify VA when a student is placed on probation
  - Via Right Now Web (VA's internet inquiry system in the Q&A section of the GI Bill website)
- Notifications should include:
  - Student's name
  - VA file number
  - "Academic Probation" in subject line
- If multiple students are being reported, you may submit a single notification by using the spreadsheet on pages 72-73 of the SCO handbook (or the link within the School Resources section)
- Advise students of counseling services available to them (Chapter 36)



# Miscellaneous

## Reporting Probation, Suspension and Graduation

### Suspension

- SCO's must promptly report to VA when a student is no longer meeting the standards of progress for ***your*** school
  - Terminate the last term during which the student is entitled to payment
  - If the student is not returning, you must still terminate
- A student may not remain on probationary status for an indefinite period of time
  - Generally, this means 2 terms
- If the student is academically suspended and submits documentation to appeal and the suspension status is overturned, you do not terminate the certification

# Miscellaneous

## Reporting Probation, Suspension and Graduation

### Graduation

- Schools are requested to report graduation or program information to VA
  - Once a student graduates from a degree program or a Non-College Degree program, the school should submit a Notice of Change in Student Status (aka VAF 22-1999b)
  - If graduating from degree program, “Graduation” should be selected as the termination reason
  - If the student is completing a Non-College Degree program, “End of Term or Course” should be selected as the termination reason
  - The last date of the term selected will be pre-populated as the date of termination.
  - If subsequent terms were previously certified, VA-ONCE will prompt you to terminate those enrollments, or to leave them as previously certified
- 74 – Ensure program information is accurate

# Miscellaneous

## New Toolkit for Veteran Friendly Institutions

- The American Council on Education (ACE) has launched an enhanced online Toolkit for Veteran Friendly Institutions featuring blogs and interactive discussion forums for participating institutions and furthering ACE's mission of supporting higher education programs that ensure veterans are college and career ready.
- Go to - <http://vetfriendlytoolkit.acenet.edu/>

# Miscellaneous

## Work-Study Video Online

Mr. Curtis Coy, VA's Deputy Undersecretary for Economic Opportunity, discusses the benefits of the work-study program for those using the GI Bill.

[http://gibill.va.gov/resources/education\\_resources/programs/work\\_study\\_program.htm](http://gibill.va.gov/resources/education_resources/programs/work_study_program.htm)

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# Miscellaneous

## VA Under Secretary for Benefits Letter to School Certifying Officials

The VA Under Secretary for Benefits has sent a letter to School Certifying Officials discussing ways educational institutions can assist with timely VA education payments

[http://gibill.va.gov/documents/letters/USB\\_Letter\\_July2013.pdf](http://gibill.va.gov/documents/letters/USB_Letter_July2013.pdf)

# Miscellaneous

## Education Claims Processing Timeliness Statistics Now Available

Timeliness statistics now available for each Regional Processing Office.

[http://gibill.va.gov/contact/regional\\_offices/index.html](http://gibill.va.gov/contact/regional_offices/index.html)

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# Questions?

Thank you for all you do to serve our  
Nation's veterans and their dependents!

PowerPoint Presentation by Katherine Snyder; some information contained within the slides obtained from the GI Bill website as well as VA.