Education Liaison Representative

• Receiving, reviewing, and taking appropriate actions on all approval notices submitted by SAAs and ensuring that VA only pays for programs that are approved in accordance with 38 U.S.C. Chapter 36.
• Updating the Web Automated Approval System (WEAMS) with program approval and other information about an approved facility.
• Disseminating approval information to all concerned elements within VA and approved schools.
• Acting as a liaison between the Regional Processing Offices and schools regarding issues of program approval.
• **Training the SCO on their certification processes.**
• Providing information to SCOs regarding the proper interpretation of all VA education rules, regulations, policies, and procedures. This includes giving presentations at education conferences and workshops.
• Conduct random liaison visits or as requested
• Conducts EO and Risk Based Compliance as needed
School Certifying Official (SCO)

The following information provides the basic responsibilities of an educational institution and VA Certifying Official. Each school will designate at least one VA Certifying Official to carry out reporting requirements. The designation will be made on VA Form 22-8794 (Designation of School Certifying Official). It is important that a new Form 22-8794 be submitted any time there is a change in certifying officials. Each 8794 submitted must include all names, since the new form supersedes the old one. The form may be obtained from your ELR.
Responsibilities for Reporting

Keep VA informed of the enrollment status of Veterans and other eligible persons. Use basic forms to keep VA informed, such as:

- Enrollment Certification (VA Form 22-1999) to report required enrollment information
- Notice of Change in Student Status (VA Form 22-1999b) to report changes to enrollment information
- Monitor the subjects pursued by a student to certify to VA only those subjects that apply to the student’s program
- Monitor student’s grades to ensure s/he is making satisfactory progress; report when a Student was terminated due to unsatisfactory progress
- Monitor student’s conduct and report when student is suspended or dismissed for unsatisfactory conduct
Responsibilities for SCO’s

- Retain file of VA papers submitted & records of academic progress, program pursuit, etc.
- Maintain records for at least three years following the student’s last date of attendance
- Ensure that records are kept in a safe place and that the privacy of VA students is protected
- Attend VA training opportunities
Responsibilities for SCO’s

All personnel who are involved with certifying VA education beneficiaries are highly encouraged to enroll and participate in the VA Training and Performance Support System (TPSS) **School Certifying Official Course**. Through this online school official training course you will learn how to:

- Identify your ELR and when / how to contact him/her
- How to reset your password or post-test if locked out
- Learn VA-ONCE capabilities and how to use it for certifying enrollments
- Print a certificate showing your completion of the SCO Course
Certification Responsibilities

- Courses Approved by the SAA/VA
- Meets Students’ Learning Objectives
- Not a Repeat of Previously Passed Courses
- School will Promptly Report any Changes
- Noncredit R/D classes Required
- Meets 85/15 Rule
- Reasonable Diligence in Meeting all other VA Requirements
What has to be Certified?

• What must be certified depends on:
  – Type of Program (IHL, NCD, OJT)
  – Benefit Chapter (30, 1606, 33)
  – Active Duty Status
  – Training Time (Less than ½ Time)

• Generally must report:
  – Program
  – Term Dates
  – Costs
  – Credit/Clock Hours
Certification- Non Chapter 33

• Program
• Term Dates
• Hours
• Remedial Hours
• Tuition & Fees, if Active Duty or Less than ½ Time
• Training Time for Graduate Students
Certification - Chapter 33

- Program
- Term Dates
- Hours (Res, Dist, R/D, Clk)
- Tuition & Fees
- YR Amount, if applicable
- Graduate Student Full-Time Hours
Certification Programs

• Programs must be approved

• All classes certified must apply toward the students program

• No VA Form 22-1995/5495 is needed if student is changing programs within the same facility
Certification Term Dates

- **Standard Terms** *(Semesters-15 to 19 weeks, Quarters-10 to 13 weeks)*
  - Classes that begin and end in the same calendar week can be certified as the term start in end date
- **Non Standard Terms** *(late starts, mini terms, accelerated, Ad Hoc)*
  - Only classes that begin and end on the same day should be certified together
Currently it is understood that the term “Calendar Week “is defined as Sunday to Saturday, therefore schools that have classes starting on different weeks must report the appropriate start date for those specific classes.

Effective any (Standard) term, quarter, or semester with a start date after the date of notification. The term “calendar week” will be understood to mean “seven calendar days.”

- If a student enrolls in a course and the actual first day that the student attends class is no later than the seventh calendar day of the term, then the beginning date of the certification will be the first day of the term, quarter, or semester in which the student is enrolled.

For example: If term starts on Friday, January 1st, then the first day of attendance must be between January 1st and January 7th (i.e., from the first through the seventh calendar day of the term).

- If a student enrolls in a course and the actual first day that the student attends class is after the seventh calendar day of the term, then the beginning date of the award will be the actual date of the first class scheduled for that particular course.
Certification - Hours

• Schools with multiple consecutive sessions
  – Do not lump hours together
  – Certify each mini session separately

• Resident, Distant, Remedial, and clock hours are reported separately for all chapters

• Graduate Students number of hours considered fulltime by your school (for that term)
Certification Yellow Ribbon

- Report up to half of the unmet charges per your Yellow Ribbon agreement.
- Student must be at 100% level
- Public School:
  - Difference between In-State Net Costs and Out-of-State Net Costs
- Private School:
  - Net amount beyond $21,970.46 (2016/2017)
Certification Changes

• Adjustment
  – To report an increase or decrease in credit hours. If tuition, fees, or Yellow Ribbon were reported, they must also be changed to correspond to the adjusted hours

• Amendment
  – To change begin date, end date, tuition and fees, Yellow Ribbon, add a remark, and advance pay and accelerated pay requests on a certification already submitted

• Termination
  – To report a complete withdrawal from an enrollment period, or to report graduation or program completion
Certification Changes

• Non-33s
  - A change in dates, ROP-rate of pursuit, or reportable costs

• 33s
  - Any change in dates, hours (number or type), or costs
Certification Changes

• Within 30 days (Of action or Notification)

• Reduction in Hours
  – Report new costs as if student were enrolled in reduced hours from beginning of term
  – VA will Prorate

• LDA/EFF
  – Last date of Attendance
  – Effective Date

• MITC (Mitigating Circumstances)
  – Should only be annotated if evidence is on file
Certification Miscellaneous

- Undeclared Major
  - By Junior Year
- Matriculation
  - By Third Term
- Guest Student
  - Parent Letter on File
- Active Duty T/A (Now must certify fees for Chapter 30)
  - Top Up
Certification Miscellaneous

• Unsatisfactory Progress, Conduct, or Attendance
  - LDA/EFF

• Probation
  - Right Now Web

• Graduation
  - Termination
Prohibited Payments

• Non-Punitive Grades (New Policy)
• Non-Attendance (Attendance policy)
• Audited Classes
• Repeat of Previously Passed Courses
• Classes outside program requirements
• Previously Qualified
• On-Line Remedial
• Leave of Absence
What to do if a student repeats a course

Classes that are successfully completed may not be certified for again for VA purposes if they are repeated. However, if a student fails a class, or if a program requires a higher grade than the one achieved in a particular class for successful completion, that course class may be repeated and certified to VA again.

Example 1, if a Nursing program requires a “B” or better in Biology, then that class may be repeated if a “B” or better was not earned. That requirement must be in the school catalog.

Example 2. If a course is required for graduation, a student may repeat the course and be certified for it until it is successfully completed. No further information needs to be provided to VA regarding those courses.

Example 3. If a student chooses to repeat a course that was successfully completed, just to improve their GPA, that course cannot be certified to VA.
Remedial courses

Remedial and deficiency courses are courses designed to correct deficiencies in Basic mathematics, English, and Reading at the elementary or secondary level. These courses can be certified as part of an approved program, but only for students for whom a verifiable need has been established. Keep test results and other documents in the student’s file that support the student’s need for remedial and deficiency courses.
Remedial courses

Remedial and deficiency courses offered as independent study (online) cannot be approved and cannot be certified to VA.

If a student fails to meet the objective of the remedial course they may continue to take the course until they have met the criteria to advance.

If the student passes the remedial course and then fails the next level they can not repeat the remedial course in which they have already demonstrated proficiency.
What to do with a walk away

Schools with an established attendance policy must monitor compliance with that policy, enforce the policy, and report terminations due to violations of the policy to VA. However, absences that do not violate the established attendance policy don’t need to be reported. Schools that don’t have an established attendance policy are not required to report changes in attendance.
How to Report Probations

Schools that have an academic progress policy allowing for a period of academic probation prior to termination for Unsatisfactory Progress (Academic Suspension) should notify VA promptly when a student receiving VA education benefits is placed on academic probation. Notifications should be sent using VA’s “Ask a Question”.
How to Report Probations

If multiple students are placed on academic probation (e.g., end of term, semester, quarter) schools may submit a single notification to VA by indicating that multiple students were placed on academic probation in the text and attaching an Academic Probation Spreadsheet listing each student.

<table>
<thead>
<tr>
<th>Benefit Chapter</th>
<th>SSN/File Number</th>
<th>Payee</th>
<th>Last Name</th>
<th>First Name</th>
<th>Facility Code</th>
<th>Start Date Academic Probation</th>
<th>Zip Code Current Address</th>
</tr>
</thead>
</table>

All notifications must include “Academic Probation” in the subject line.
How to Report Probations

Students should be advised of any counseling services available to them at the school in order to resolve academic or other problems and to establish a meaningful plan for successful completion of their education or training. Schools and training establishments are asked to remind students of the counseling services and tutorial assistance benefits available through VA.
How to Report Suspensions

Unsatisfactory Progress (Academic Suspension) must be reported to VA as a termination. Terminate the semester the student is suspended. If suspension follows the fall semester, for example, terminate fall semester. Choose “Unsatisfactory Attendance, Conduct, or Progress” as the reason.
How to Report Suspensions

VA-ONCE will insert the end date of the term as the default “LDA/EFF Date”. You can change the default end of term date if it isn’t the correct date.
How to Report Suspensions

If a student successfully petitions the dismissal, is readmitted, and is already certified the subsequent term, don’t terminate the student. Instead, annotate the student’s file that the student was dismissed and readmitted following a successful appeal. If enrollment status changed the subsequent term, be sure to adjust the credit for the term. When you submit the termination, a pop-up window will appear asking about subsequent terms if any are to be certified.
What to do with suspensions

Student will receive a suspension letter:

Our regulations require that students maintain satisfactory attendance, conduct, and progress to continue receiving VA education benefits. The school certifying official is required to notify VA when a student doesn't meet these requirements. We stopped your educational assistance payments on May 17, 2014, because we received school notification that your progress in training hasn't been satisfactory.

**What You Can Do to Restart Your Benefits**

If you **re-enroll** in the **same program** and in the **same school**, we can start your payments when your school sends your enrollment information.

If you **enroll** in a **different program** or a **different school**, you must send us a completed VA Form 22-5495. In addition, before we can pay benefits we may need evidence to show that the cause of your unsatisfactory progress in training is not likely to recur. Here are examples of the kinds of information that we may require:

- A written explanation of why you couldn't maintain satisfactory progress in training.
- A written explanation of how you plan to overcome the problems causing your unsatisfactory progress in training.
- A transcript of grades or evaluation of performance from your prior school or place of training.
- A copy of your official notice of acceptance into your proposed program. This should include the school's evaluation of your prior training and experience.
- A copy of your counselor's recommendations if you have received counseling at school.

If you would like counseling assistance in choosing a new program, you may contact VA at 1-800-827-1000. (For the hearing impaired, dial 1-800-829-4833.)
Beginning November 15, 2015, VA requires students using the Post-9/11 GI Bill to provide mitigating circumstances when they withdraw from or drop a course after the drop/add period and receive a non-punitive grade.

Acceptable mitigating circumstances must be provided in order to pay benefits for the period of attendance prior to the drop date. If they are not provided and accepted, any benefits paid from the beginning date of the term will be considered an overpayment, and a debt may be established.

Mitigating circumstances are circumstances beyond the student's control that prevent the student from continuing in school or that cause the student to reduce credits.
Mitigating Circumstances

Examples are:
- An illness or death in the student’s immediate family.
- An illness or injury afflicting the student during the enrollment period.
- An unavoidable change in the student’s conditions of employment.
- An unavoidable geographical transfer resulting from the student’s employment.
- Immediate family or financial obligations beyond the control of the claimant that require him or her to suspend pursuit of the program of education to obtain employment.
- Discontinuance of the course by the school.
- Unanticipated active military service, including active duty for training.
- Unanticipated difficulties with childcare arrangements the student has made for the period during which he or she is attending classes.

VA-ONCE will display a Mitigating Circumstances box. The drop down arrow for the box will display the above list of mitigating circumstances. If the SCO knows the circumstance and it’s clearly one of the circumstances listed, then the SCO should select that circumstance and documentation of mitigating circumstances provided by the student should be retained within the student’s file.
VA automatically grants mitigating circumstances for up to 6 credits the first time a student reduces or terminates and mitigating circumstances must be considered. This automatic grant is called the 6-Credit Hour Exclusion. The exclusion is a one-time grant made the first time mitigating circumstances must be considered for the student. Up to 6 credits can be excluded if the student has been awarded benefits for the credit. The 6-Credit Hour Exclusion cannot be granted if the student completes the term and receives non-punitive grades.

- If the student withdraws from 3 credits, the exclusion will be granted for 3 credits and the student’s one time exclusion is used.

- If the student withdraws from 12 credits, the exclusion will be granted for 6 credits, the student’s one time exclusion is used, and the student must provide mitigating circumstances for the other 6 credits.
Certifying official must maintain copies of all certifications and changes in enrollment for a minimum of 3 years after last day of attendance.

Hard copy or electronic format is ok.

All documents subject to review by SAA or VA to include Chapter 31 caseworkers.
85/15 Regulatory Guidance

- 38 U.S.C 3680A(d)
- 38 CFR 21.4201
- Prohibits paying benefits to students enrolled in a course when more than 85% of the students enrolled in the course are having all or part of their tuition, fees, or other charges paid to or for them by the school or VA
Who is a VA Eligible Person?

1. VA-eligible person is a student having all or part of their tuition, fees, or other charges paid to or for them by the VA.

2. If VA students are excluded from the school's financial aid (i.e., grants, scholarships, or other financial assistance including the school disregarding nonpayment) because they are entitled to VA benefits, the school must count them on the VA side of the ratio even if they are not receiving VA benefits. This requirement does not apply to financial assistance from the school or federal agencies for graduate level training.

   -- XYZ Scholarship, an institutional tuition waiver is not available to veterans. The number of non-VA students receiving XYZ Scholarship must be added with VA students.

Example: employee tuition waivers
Who is a Counted on the Non-VA Side?

1. Students who are not veterans or reservists, and are not in receipt of institutional aid.

2. All graduate students in receipt of institutional aid.

3. Students in receipt of any Federal aid (other than Department of Veterans Affairs benefits).

4. Undergraduates and non-college degree students receiving any assistance provided by an institution, if the institutional policy for determining the recipients of such aid is equal with respect to veterans and nonveterans alike.
Any Course?

Program of Education

(1) A combination of subjects or unit courses pursued at a school which is generally acceptable to meet requirements for a predetermined educational, professional or vocational objective; or

(2) Such subjects or courses which are generally acceptable to meet requirements for more than one objective if all objectives pursued are generally recognized as being related to a single career field; or

(3) Any unit course or subject, or combination of courses or subjects, pursued by an eligible veteran at any educational institution required by the Administrator of the Small Business Administration as a condition to obtaining financial assistance under the provisions of section (7)(i)(1) of the Small Business Act.
Counting?

An 85-15 percent ratio must be computed for each course of study or curriculum leading to a separately approved educational or vocational objective. Computations will not be made for unit subjects, unless only one unit subject is approved by the State approving agency to be offered at a separate branch or extension of a school.

Courses or curricula which are offered at separately approved branches or extensions, as well as courses or curricula leading to a secondary school diploma or equivalency certificate offered at any branch or extension, must have an 85-15 percent ratio computed separately from the same course offered at the parent institution.

The count of students attending the branch may not be added to those attending the parent institution even for the same courses or curricula. However, the count of those attending courses or curricula offered at an additional facility, as opposed to a branch or extension, must be added to those attending the same course at the parent institution.

The school must compute the full–time equivalency for part–time students.
General 2-year curricula at 2-year institutions of higher learning, general curricula such as AA (Associate of Arts) or AS (Associate of Science) degrees with no major specified, will require separate computations for each curriculum. Terminal 2-year courses (i.e., AAS (Associate of Applied Science), dental technology or auto mechanics certificate) and other associate degree courses where a field is specified must be computed separately for each objective.
Students attending 4-year institutions of higher learning and graduate schools may be counted in general curricula such as BA (Bachelor of Art) and BS (Bachelor of Science) only until the normal point at which the school requires the student to declare a major subject. Then the 85-15 percent computation must be made for each specific curriculum, i.e., BS (Bachelor of Science) in electrical engineering, MA (Master of Arts) in English, etc.
Breaking it Down  NCD

NCD (non-college degree) courses must be computed separately by approved vocational objective. If several curricula lead to the same coded vocational objective, each must meet the 85-15 percent requirement separately, unless it can be shown that two or more courses are identical in all respects (scheduling, hours devoted to each unit subject, etc.). Branch or extension courses will be computed separately from courses at the parent facility. Courses offered on a full- and part-time basis which are identical in length and content will be combined for computing the ratio.
If the school is organized on a term, quarter or semester basis, the calculations must be submitted no later than 30 days after the beginning of each regular school term (excluding summer sessions), or before the beginning date of the next term, whichever occurs first.

If a school is not organized on a term, quarter or semester basis, reports must be received by the Department of Veterans Affairs no later than 30 days after the end of each calendar quarter.
Reporting-Statement of Assurance

List each program approved for VA education benefits with currently enrolled VA Students.

All concentrations (may also be identified by school as emphasis; specializations; etc.) must be listed and computed separately. If “Undeclared” is listed, those students counted within that program may have only taken general education coursework. Any undeclared student who has taken courses associated with a specific major’s curriculum must be calculated within that program, even if student has not officially declared that major.

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<tr>
<th>COLUMNS</th>
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</table>

- **COLUMN 1**: Program Name
- **COLUMN 2**: Number of FTE VA Students
- **COLUMN 3**: Number of FTE Non-VA Students
- **COLUMN 4**: Total Enrollment
- **COLUMN 5**: VA Student Percentage
- **COLUMN 6**: Date of Calculation

SCo HB Page 121
Reporting-Request for 35% Waiver

When 35 percent or less of a school’s total enrollment receive VA benefits, the school and each branch with separate administrative capability may certify to that effect and receive a waiver of periodic reporting of the percentage of VA students enrolled in each program. The school must count all students receiving VA benefits on the VA side of the ratio. The certification is required only once. The waiver will remain in effect unless the school’s percentage of VA students rises above 35 percent.

<table>
<thead>
<tr>
<th>Number of VA Students</th>
<th>Total Enrollment</th>
<th>VA Student Percentage</th>
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School Official’s Signature

Date Signed
This is to inform you that we have accepted your waiver request of the 85-15 reporting requirements under CFR 21.4201 due to having 35% or less of your total students receiving VA education benefits.

This waiver will remain in continuous effect. You will still need to calculate your 85/15 enrollment numbers each term; however you are not required to report to them to the VA unless a program/course exceeds 85% or your total student enrollment exceeds 35%.

This waiver was based on your calculations that were submitted on: _______________.

WAIVED
What do I need to do Now?

1. Calculate %
2. Submit to ELR
3. Request Wavier if in compliance
Compliance Surveys

- Periodic review of school records by VA
- Verifies student is being certified correctly and payments to school and student are correct
- Mainly conducted by SAA and ECSS
Compliance Survey

- 100% institutions with 300 or more students
- 100% non-college degrees NCD’s
- 100% OJT, Flight, APP
- 100% For Profit Facilities
- 10% institutions with 299 or less
Compliance Trends

- Consolidating of terms
- Not reporting changes in schedules
- Fees
- Term Dates not matching school schedule
- Repeated or unrequired courses
- On Line Remedial
School Liability

Facilities can be held financially liable for failure to adhere to VA policies and procedures.
http://www.gibill.va.gov/
VA Once

- General
- Add Student
- Certify
- Adjust/Amend
- Term Dates
- Admin Functions
- E-Mail
VONAPP (Veterans On Line Application) website is an official U.S. Department of Veterans Affairs (VA) website that enables service members, veterans and their beneficiaries, and other designated individuals to apply for benefits using the Internet.

http://vabenefits.vba.va.gov/vonapp/default.asp
Joint Service Transcripts (JST)

https://jst.doded.mil/smart/signIn.do

http://www.jointservicetranscript.com/
Click on the state initials in the map or the listing of schools below to view facilities in that state.
Annual Reporting Fee

• Payment from VA for reporting enrollments

• Based on number of VA students enrolled

• “The payment is to be used solely for the purpose of making certifications or otherwise supporting programs for veterans.”

• The fee is $6 ($12 if advance pay request was processed) for each student.
When to Return Money to the VA

The Seven Reasons

• Student Never Attended
• Student Completely W/D On or Before FDT
• Payment Received for Wrong Student
• Duplicate Payment
• School Decreased Reported T&F or YR
• Student Died During/Before Term
• VA Paid More than Certified
When to Return Money to Student

- Student W/D After First day of term
- Student Reduced Hours Before or After FDT
- Student Attended at Least One Day of Any of the Classes and Payment was Issued
- Refund Amount Per School Policy

Note: Sessions within terms are treated as stand-alone terms for payments and returns.
Tutorial Assistance

- May be paid for students in most education programs
- Supplements basic benefit
- Maximums: $100 per month, $1,200 total
- Certified on VA Form 22-1990t
VA Work-study

- Students must be enrolled at least ¾ time and receiving VA benefits
- Federal Minimum Wage
  - School may pay an additional amount
- Student must perform VA related work only
- Students get paid in 50 hour increments or end of month
WE Need You

The success of VA educational programs depends largely on you, as a certifying official. Your work on behalf of your institution in assisting VA students is critical in the processing and payment of veterans educational benefits. We could not do our job without you.
Sources of Assistance

- SCO Handbook
- SCO Hotline 1-855-225-1159 (Not for student use.)
- VA Email Inquiry System (aka RNW)
  - [www.benefits.va.gov/gibill](http://www.benefits.va.gov/gibill)
- VA Customer Service
  - 888-442-4551
- Debt Management Center
  - 800-827-8387
  - dmcedu.vbaspl@va.gov (school only email)
- ELR (Do not provide to students/parents)
- [www.benefits.va.gov/gibill](http://www.benefits.va.gov/gibill)
Training resources can be found at [www.benefits.va.gov/gibill](http://www.benefits.va.gov/gibill)

- VA-ONCE quick reference user guide
- SCO Handbook
- Online School Official Training
- Attend your SCO workshop (contact your ELR for details)

National Conferences

- AVECO- Association of Veterans Education Certifying Officials
- NAVPA-National Association of Veterans’ Program Administrators
Questions?

School Certifying Official Handbook

U.S. DEPARTMENT OF VETERANS AFFAIRS