



WVASFAA – Fall 2019

Veterans Education & Training Updates

*“Happiness can be found even in the darkest of times if one only remembers to turn on the light.”
~ Albus Dumbledore*



Contact

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Basics of VA Education Benefits

- **Chapter 33 (Post 9/11 GI Bill):** pays T/F direct to the school AND a living stipend direct to the student = served AD, transferee, or Fry
- **ALL OTHERS:** pays a living stipend direct to the student and student pays the school; 30 (Montgomery GI Bill), 1606 (Guard and Reserve), 35 (Dependents Education Assistance)
- Other military related education benefits
 - VOCREHAB, DOD TA, MyCAA, State NG TA, State Reeducation



Topics

- Resources
- Basics of Approval
- Zip Code Certifications
- Forever GI Bill
- Licensure, Certification, Board
- Skillset programs
- Contracted Courses
- Yellow Ribbon
- In State Tuition
- Compliance Surveys (And NEW Risk Based Surveys)
- VA Pending Payment Federal Law
- Rolling/Open Enrollments



Resources

- [GI Bill Ask a Question](#)
- [SCO Handbook](#)
- [VA ONCE Quick Reference User Guide](#)
- [GI Bill Comparison Tool](#)
- [VA Yellow Ribbon](#)
- [AVECO](#)



Basics of Approval

▪ Initial Approval

- What are you? NCD, IHL, public, private, accredited, nonaccredited. Is accreditor DOE recognized?
- Authorization (Nikki Bryant) and 2 year rule

▪ Continued Approval

- Modifications to already approved programs
- New programs
- Changes to key policies: SAP, attendance, conduct, graduation requirements, refunds, facility name, location, owners, etc.
- Transitioning into an annual or every other year re-approval process



Basics of Approval (cont.)

Deemed Approved

- **Accredited public or non-profit IHL**
 - Still have to be reviewed
- **High Schools**



Basics of Approval (cont.)

Non-Accredited Programs

- **Approvable, but with additional criteria**
 - Detailed costs
 - Pro-rated Refund Policy
 - List of faculty, officials, owners.
 - Description of facilities and equipment
 - Financially Sound
 - Calendar



Basics of Approval (cont.)

Recurring Approval Issues

- **Catalog Identifying Data?**
- **Costs**
 - We don't approve the costs of your programs.
- **Erroneous, Deceptive, Misleading**
 - If your catalog boasts job placement or similar success data or stories, be prepared to back it up.
- **Transfer Credit**
 - You must evaluate and grant where warranted.



Basics of Approval (cont.)

Recurring Approval Issues (cont.)

- **2 Year Rule**

- If you are a private nonprofit or private for profit and not an IHL (not offering degrees), you must be in operation for at least 2 years prior to our approval. If you have a complete turnover in owners/staff or a change in location, the 2 year rule could get triggered again.

- **Program Inventory**

- Review your catalog vs. our inventory BEFORE you submit your application or materials. Know how to use [WEAMS](#).

- **Satisfactory Academic Progress**

- Our biggest issue recently has been review of your SAP. Just because it has been that way for years doesn't mean it's okay!
- You must have a policy that meaningfully evaluates the students at key points (not just at the very end).
- Your policies can't only refer to Financial Aid.



Basics of Approval (cont.)

Prohibited Programs

- Any bartending course or personality development course.
- Any sales or sales management course which does not provide specialized training within a specific vocational field.
- Recreational instead of vocational (more later).
- Noncollege Degree (“NCD) via independent study unless you’re an IHL or a public Career and Technical Center.
- Programs pursued by radio.
- Contracted programs with unapproved third party (more later).
- Entrepreneurship Courses (can only be approved in limited circumstances if they don’t lead to a certificate of at least 30 credit hours).



Basics of Approval (cont.)

Removing Concentrations

- **For all new approval actions, we are removing concentrations from your inventory.**
 - Still can be certified but must be done so under the core major as matched to your approved inventory.
 - Still have to be aware of 85/15 issues.



Zip Code Certifications

- **System is currently live and available for terms beginning after 1/1/2020.**
- **VA projects system will be live for terms prior to 1/1/2020 sometime in December, 2019.**
- **Extension campuses.**
- **Continue to work toward being ready to go back and correct prior terms.**



Forever G.I. Bill ®

- **Forever**– no more delimiting date (but, only for those leaving service after 1/1/2013, still 15 years for those prior)
- **Purple Heart** – 100% eligibility, Post 9/11
- **Yellow Ribbon** – Fry and Purple Heart Remaining Entitlement – new view in VA ONCE (TBD???)
- **Campus zip code** where majority of hours pursued
- **Dependents Ed. Asst.** now 36 months instead of 45 but higher payment amounts
- **First Day of Term** – 7 Calendar Days
- **Reporting Fee** – \$16 bucks! Separate account if +100
- **Mandatory Training**



Licensure, Certification, Board

- (14) In the case of a course designed to prepare an individual for licensure or certification in a State, the course—(A) meets all instructional curriculum licensure or certification requirements of such State = 38 USC 3676
- (15) In the case of a course designed to prepare an individual for employment pursuant to standards developed by a board or agency of a State in an occupation that requires approval, licensure, or certification, the course—(A) meets such standards; = 38 USC 3676
- (d)...State approving agency shall disapprove a course of education described in paragraph (14) or (15) of section 3676(c) of this title unless the educational institution providing the course of education—(1) publicly discloses any conditions or additional requirements, including training, experience, or examinations, required to obtain the license, certification, or approval for which the course of education is designed to provide preparation = 38 USC 3679



Skillset or other NCD Programs

- **Programs that do not lead to a certificate or a degree can be approved so long as they lead to an identifiable (O*NET) occupational objective.**
 - For example: A two-week course to become a real estate agent. BUT, don't forget about rules regarding licensure, certification, or Board approval.



Contracted Courses

- **Contracted courses exist when the credential granting institution has contracted with an outside entity to provide some portion of the program's curriculum**
- **Contracted courses must be specifically approved for VA enrollments = the outside entity must be approved (VA laws, State laws, etc.)**
- **The credential granting institution certifies everything**



Yellow Ribbon

- **Yellow Ribbon G.I. Education Enhancement Program**
 - All public institutions of higher education are participants of the US Department of Veterans Affairs' Yellow Ribbon G.I. Education Enhancement Program, also known as the “bridging the gap” program. This benefit helps veterans afford programs where costs exceed the amount of funding provided by the G.I. Bill. More information is available in [West Virginia State Code 18B-10-7C](#) or through the [West Virginia Higher Education Policy Commission](#).
- **Open to those that sign the agreement.**
- **Required for Public IHLs at Undergrad level and encouraged at Grad level.**
- **The agreement continues each year even if you do nothing.**



In-State Tuition (Public IHLs)

Covered Individuals from July 1, 2015 – July 1, 2017 (Section 702 of Public Law 113-146)

- **Living in WV (dorms, apartments, park benches, etc.)**
- **Using Chapter 33 or 30**
- **At least 90 days consecutive AD service**
- **Within 3 years of their discharge date on the first day of the term (Ch. 33 transferees of transferors still on AD were not covered and Fry recipients where date of death was longer than 3 years were not covered)**



In-State Tuition (Public IHLs) (cont.)

Covered Individuals from July 1, 2017 – March 2, 2019 (Section 417 of Public Law 114-315)

- **Same as before except now there are two “new” classes of covered individuals**
 - Dependents of AD using transferred 33 benefits
 - Fry Scholarship (regardless of date of death)



In-State Tuition (Public IHLs) (cont.)

Covered Individuals from March 1, 2019 onward
(Section 301 of Public Law 115-251)

- **Covered Individuals from March 1, 2019 onward (Section 301 of PL 115-251)**
 - Same as before except now also includes Ch. 31 Voc-Rehab students (no reference to discharge date)



In-State Tuition (Public IHLs) (cont.)

- **Continuously enrolled?**
- **How do I determine discharge date?**
 - DD 214
 - COE (creditable length of service blocks)
 - [SCRA](#)
 - Contact us



In-State Tuition (Public IHLs)

Analysis

1. Nothing supersedes living (can include dorms, renters, park bench, etc.) in WV. That is always going to be the first test. If yes,
2. Is student using Chapter 30, 31, or 30 benefits? If yes, continue. If no, done. Not a covered individual.
3. Is student using Chapter 31? If yes, Certify resident tuition (no 3 year rule for 31). If no, next.
4. Is student using Chapter 30? If no, skip below to number 6 for Chapter 33 students. If yes, is student's term start date within 3 years of discharge from AD service. If yes, Certify resident tuition. If no, next.
5. Does student fall under the continuous enrollment exception to the 3 year rule? If yes, Certify resident tuition. If no, don't. End.
6. Is the Chapter 33 student a veteran or a transferee or a Fry? If transferee, go to 8. If Fry, Certify resident tuition at this stage (no 3 year rule for Fry). If veteran, is student's term start date within 3 years of discharge from AD service. If yes, Certify resident tuition. If no, next.
7. Does student fall under the continuous enrollment exception to the 3 year rule? If yes, Certify resident tuition. If no, don't. See if YR applies.
8. Is the Chapter 33 transferee's transferor (the mom/dad/spouse military member) still on AD? If yes, certify resident tuition. If no, next.
9. Is student's term start date within 3 years of the transferor's discharge from AD service. If yes, Certify resident tuition. If no, next.
10. Does student fall under the continuous enrollment exception to the 3 year rule? If yes, Certify resident tuition. If no, don't. See if YR applies.



Compliance Surveys

- **Who decides?**
- **Should I be worried?**
- **What is a discrepancy?**
- **What can I do in the meantime?**
- **What are the most common mistakes?**
 - Modular terms
 - Incorrect dates
 - Incorrect hours or type of hours
 - Untimely notifications to VA
 - Program pursuant
 - LOA, Withdrawals, Drops, Adds
 - Fees



NEW Risk-Based Surveys

- **Monitoring for “flags” that could warrant an inspection.**
 - Flags like: rapid fluctuations in veteran enrollment, increases in the amount of benefits per capita, volume of student complaints, rates of Federal student loan defaults of veterans, veteran completion rates, and deficiencies identified by accreditors and other State agencies, etc.
- **You are given very little notice. These began October 1, 2019.**
 - These cannot be rescheduled. If you will be out of the office or otherwise unavailable on the date(s) of a risk-based survey, your direct supervisor will be the point of contact.



VA Pending Payment Federal Law

- PL 115-407, Section 103. Effective August 1, 2019
- No punitive measures against students using Ch. 33 or Ch. 31 while payment is pending from the VA
- You can require the COE by first day of semester
- You can take measures when you know based on the COE that full payment will never be made by VA (a partial award Ch. 33 student) but only reciprocal to the amount you will not receive from VA. For example, T/F is \$10k. Student presents a COE showing 80% eligibility. You know you will not receive more than \$8k from VA. What measures would you normally take at the start of the semester when \$8k of a \$10k bill was paid and \$2k was outstanding?
- Our most current guidance on this issue is that **VA is last payor** – after WV Invests and after WV National Guard Tuition Assistance



Rolling or Open Enrollments

- Make certain it's described this way in the catalog.
- Make certain you certify correctly.



Miscellaneous

- **War Orphan Education Program**

- Students who qualify for the War Orphan Education Program will not be charged tuition and fees by a West Virginia post-secondary education or training institution. Award amounts administered by the West Virginia Department of Veterans Assistance are to cover costs associated with room, board, books and other living expenses. This amount fluctuates according to the number of applications received each semester. No more than \$1,000 will be awarded to a student in any one semester and no more than \$2,000 will be awarded to a student in any one year. More information is available in West Virginia State Code 18-19. [Applications are available here](#)



Miscellaneous (cont.)

- **High School Diplomas for Veterans**

- West Virginia veterans who served in WWII, Korea or Vietnam and did not graduate from high school may be awarded a high school diploma. The diploma may be granted by the veteran's current county of residence or by the county in which the school he/she attended is located. More details are available in [West Virginia State Code 18-2-34](#) or [Title 126 Legislative Rule Series 96](#). [Click here for an application.](#)

- **Medal of Honor & Purple Heart Tuition Waivers**

- All public institutions of higher education waive tuition and mandatory fee charges for West Virginia residents who have been awarded the Medal of Honor or Purple Heart. More information is available in [West Virginia State Code 18B-10-10](#) or through the [West Virginia Higher Education Policy Commission](#).



Miscellaneous (cont.)

- **Veterans Re-education Assistance**

- Since fiscal year 1997, the West Virginia legislature has included in the annual budget various amounts of funding for postsecondary education. This program offers up to a \$500 per semester stipend to veterans who are enrolled in a certified post-secondary class. Additionally, this program can assist veterans with vocational and non-traditional education endeavors on a case-by-case basis. [Click here to view the application.](#)

- **Veterans Upward Bound**

- This program supports the efforts of public institutions to be veteran friendly by providing academic and student support services that address the unique needs of student veterans. More information is available in [West Virginia State Code 18B-4-9](#) or at www.vubwv.org.



Questions?

