VA | NCD Certifications

AVECO July 15-18, 2019
Dr. Lisa Cox-Michigan Education Liaison Representative
Slide excerpts extracted from Non-College Degree (NCD) Schools & Programs Briefing by Kathy Snyder

NCD Certification Objectives

Prepare to Certify

NCD Course Measurement

Certification Process

Changes/Corrections to Certifications

Reporting End of Term or Course

Mitigating Circumstances

Questions

Non-College Degree (NCD)

How is NCD defined?

- A course or program of education that does *not* lead to a standard college degree

What types of educational institutions offer NCD programs?

- Standalone NCD schools
- Institutions of Higher Learning (IHLs) with NCD programs

Before *YOU* Certify

What to do when a VA student walks in…

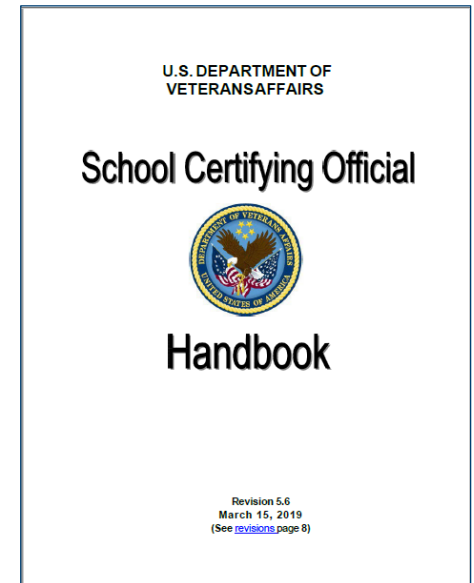**Has the student previously applied for VA education benefits?**

- Veteran

- Dependent

Online or hardcopy application?

Direct to: www.Vets.gov

Received a COE (Certificate of Eligibility)?

*SCHOOL RESPONSIBILITIES
(page 18 of current online SCO handbook)

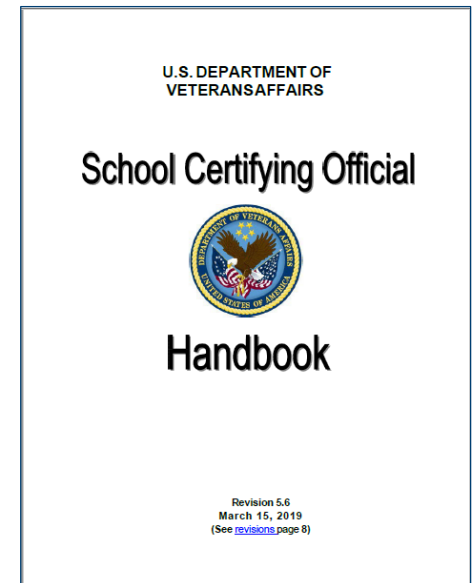U.S. DEPARTMENT OF
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Revision 5.6
March 15, 2019
(See revisions page 8)

Before *YOU* Certify

Do you have everything you need

Before **you certify a student's enrollment to VA?**

- Program approval (per 22-1998 Report)
- VA Education documents
- Student/school records
- SCO Handbook
- Perhaps create a checklist to follow

VA STUDENT CHECKLIST		
Name:		**File Number:**
Program:		**Chapter:**
☐	Application for admission to your educational institution	
☐	Enrollment agreement/contract (If applicable) which indicates clock hour program or academic degree program	
☐	Registration documents	
☐	Record of previous education and training (prior credit). School evaluation of credit for all previous postsecondary education and training. Official transcripts must also be on file.	

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Before *YOU* Certify

Program Approval

SAA (State Approving Agency) Approval Letter

    VA Form 22-1998 **(aka WEAMS report)**

- **Please Do Not Certify programs not listed on your facility's 22-1998 Report**
- **Do Not add new programs into VAONCE until approved by the SAA and concurred by VA thus listed on the 22-1998 WEAMS Report**

Ensure you are aware of the modality in which program is taught

- **Is your educational institution approved for that type of modality?**

Signed MOU to submit VAONCE electronic certifications

Before *YOU* Certify

VA Form 22-1998

NCD Programs

Code		Type Description	Length	Mode	Full Time	Mode	Effective Date	Withdrawal
Remarks:								
320	D	LANDSCAPE MANAGEMENT	900	C	22	C	08/02/2004	
Remarks: CERTIFICATE								
313	D	MEDICAL ADMINISTRATIVE SPECIALIST	1050	C	18	C	08/24/2015	
Remarks:								
313	D	MEDICAL ASSISTING	1300	C	18	C	08/20/2012	08/20/2012
Remarks: CERTIFICATE								

SAA-approved policies and programs must be published and provided to students

- – Catalog
- – Addendum

Before *YOU* Certify

VA Education Documents

Application for VA education benefits (all but CH 31)*
Direct to: www.Vets.gov

- VA Form 22-1990 or 22-5490
- 22-1990e if TOE (Transfer of Eligibility)

Change of program or place of training form
- 22-1995 or 22-5495
- Not necessary if changing programs *while at the same school*
    When prompted in VA-ONCE, indicate you have the form on file

Certificate of Eligibility (COE)*
- Do you know which chapter of benefits/level of eligibility?

No VA documents?
- Contact the SCO Hotline for chapter and eligibility: **855-225-1159**

*Not mandatory, but helpful

Before *YOU* Certify

MGIB Education Programs	Associated Chapter
Montgomery GI Bill®	30
Veterans Educational Assistance Program (VEAP)	32
Post-9/11 GI Bill / Transfer of Entitlement John D. Fry Scholarship / Forever GI Bill	33
Survivors' and Dependents' Educational Assistance (DEA)	35
Montgomery GI Bill Selected Reserve (MGIB-SR)	1606
Reserve Educational Assistance Program (REAP)* *Ended on November 25, 2015; some remain eligible until November 25, 2019	1607
Non-GI Bill Program – Employment Oriented for Those with Service-Connected Disabilities, Etc.	**Associated Chapter**
Vocational Rehabilitation and Employment (VR&E)	31

Before *YOU* Certify

Chapter 35
Dependents' Educational Assistance Program (DEA)

Payee #	Person Entitled	Suffix
10	Spouse or Surviving Spouse	W
41	First Child to Apply	A
42	Second Child to Apply	B
43	Third Child to Apply	C
44	Fourth Child to Apply	D
45	Fifth Child to Apply	E
46	Sixth Child to Apply	F
47	Seventh Child to Apply	G
48	Eighth Child to Apply	H
49	Ninth Child to Apply	I

Student/school records

Application for admission

Enrollment agreement/contract

Registration documents

Class schedule – ensuring certification of only required courses

- Hours per day; days per week
- Beginning and end dates of each course and/or enrollment period
- Modality of courses
- Schedule required for each course within each period certified

Before *YOU* Certify

Gather required information for the BIO Data page

Student/school records (continued)

Record of previous education and/or training and evaluation of such

- Must be documented (could possibly be obtained after student commences training)

Student account ledger

- Detailing tuition and fee charges and source of payments

Scholarship documentation

Yellow Ribbon documentation

- Not applicable at standalone NCDs or nonaccredited institutions

Enrollment reports for 85-15 percent ratio calculation

– See Appendix B of the SCO handbook

Clock Hour Measurement

Title 38 CFR § 21.4270 – Measurement of Courses

Clock or Credit Hours?...

A clock hour is defined, for VA purposes, as **60 minutes** of net instruction (In measuring net instruction there will be included are intervals not to exceed 10 minutes between classes)

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

- All standalone NCD schools, regardless of accreditation status

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

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

Clock Hour Measurement

Differences Affect Payment of Benefits
Training Time (Chapters 30, 32, 35, 1606, and 1607)

*Classroom Theory   **Shop Practice

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

§21.4270 Measurement of courses.

*….if theory and class instruction constitute more than 50 percent of the required hours in a trade or technical course not leading to a standard college degree, enrollments will be measured

**…if shop practice is an integral part of a trade or technical course not leading to a standard college degree

Clock Hour Measurement

What is and is not included in a clock hour?

- **Classroom Theory**
  - Allows for 10 minutes to change classes each hour, which can be included in the total hours of instruction (must deduct if not changing classes)
  - Also allows for 10 minutes to change subjects even if students remain in the same classroom, e.g., finish talking about business communications and switch to studying bookkeeping
- **Shop Practice**
  - Allowance for 15 minute break in morning; another in the afternoon. Can be included in total hours of instruction. Shorter breaks allowed for part-time enrollment.

§21.4270 Measurement of courses

(1) Notwithstanding the provisions of paragraph (a)(1) of this section, if a student is enrolled in a course which is not leading to a standard college degree and which is offered by an <u>institution of higher learning,</u> VA will measure his or her enrollment in the same manner as collegiate undergraduate courses are measured.

Clock Hour Measurement

Differences Affect Payment of Benefits
Sample Calculations for Rate of Pursuit (Chapter 33)

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

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

SAA Approved Program/Course Length

Do not certify more hours than the SAA has approved

>VA will only pay for the student's "<u>seat time</u>" in the classroom for the number of clock hours approved

Keep track of total hours completed

Exception

>For courses offered on a modular basis, VA will pay students to repeat a module that was failed, but only if that module is scheduled to be repeated during normal, scheduled classroom hours

>- *If repeated as makeup hours during non-class time, it may <u>not</u> be certified to VA for payment*

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

>- *Be sure to strictly enforce your approved Standards of Progress and Attendance policies*

SAA Approved Program/Course Length

When hours certified exceeds SAA Approved course length…

Veterans Claims Examiners (VCEs) at the Regional Processing Offices must review the period certified with the approved length of the program when processing the enrollment.

If the enrollment period certified exceeds the SAA-approved length of the program, VCEs will contact the school and not process the claim until certified program length issue is resolved

When the published school catalog/calendar, as approved by the SAA, includes prescheduled closures that will affect the number of regularly scheduled classroom hours, you must list the school closures in the remarks block of your certification. Include *all* scheduled school closures within the enrollment period being certified to include administrative closures, holidays, breaks, and teacher workdays, and list the actual calendar dates, not simply the name of the holiday.

Example
Remarks: School closed: 01/15/18, 02/19/18, 03/18/18 thru 03/24/18, 05/28/18. Reported for NCD Program Length purposes.

Approved Length of Course:	160.00		
Previous Hours Used:			
No. of Hrs per Week on 22-1999:	40.00		

			MM/DD/YYYY	MM/DD/YYYY
BEGIN DATA:	5/13/2017			
NO PAY DATE:	7/20/2017			

Remaining Hrs. Approved (to be used):	160.00
Total Hrs. Used for the Current Term:	388.57
Total Hrs. Used for the Entire Course:	388.57

New None Date:	06/13/17

Total Days in the Current Term:		68
Total Weeks in the Current Term:		9.7143
Remaining Weeks Approved:		4.0000
Additional 10%	+	0.4000
Total Range of Weeks:	=	4.4000
Balance of Weeks Remaining (to be used):		-5.3143
Award adjusted by (if applicable):		-37 Days

Example

If the period the SCO certifies (or intends to certify) is beyond the max payable the worksheet will provide the number of days the cert is over the max in the 'award adjusted by" field. It will also calculate the ending date that can be certified in the "New None Date" field but again one day must be deducted from that date so the ending date to certify would be 6/12/17.

SAA Approved Program/Course Length

Report the actual number of clock hours *per week* the student is *scheduled/contracted* to attend, <u>not</u> the minimum it takes to be considered full-time for VA purposes nor the number of hours the student actually attends class

Certified hours will be compared with those listed on the enrollment agreement/contract and class schedules during compliance surveys

Clock Hour Measurement

Student Enrollment Agreement

PROGRAM INFORMATION

- **Program Title**: Your SAA-approved Program (300 hours)
- **Start Date**: April 1, 2019
- **Anticipated Completion Date**:
- **Class Schedule**: **X** Day   M T W R F
- _ Evening 8:00 a.m. – 12:00 p.m.

How many clock hours should you certify to VA?

a. 300

b. 20

c. 360

Enrollment Periods

NCD Enrollment Types

1. **Term, quarter, or semester basis**

2. **Block or unit basis, i.e., modular or lockstep**

3. **Not operating on a block or unit basis or on a term, quarter or semester basis, e.g., open entry/open exit, aka, open enrollment or competency based**

Term: Any regularly established division of the ordinary school year under which the school operates.

- **Quarter**: A division of the ordinary school year from   10 to 13 weeks long
- **Semester**: A division of the ordinary school year from 15 to 19 weeks long

If a school offers training on a **nonstandard** term basis, or if there are nonstandard formats or sessions within standard terms, the beginning and ending dates of each term, session, or course must be shown separately

Schools operating on a term basis in *credit* hours

- Certify the same as other approved programs

- Program consists of individual unit subjects that are pursued consecutively

- Certify based on the school's published calendar term dates with published beginning and end term dates

- Typically the case if it is an IHL with NCD programs

  Standalone NCD schools or nonaccredited IHLs that are not a candidate for accreditation are not eligible to be approved in credit hours

Schools operating on a block or unit basis, i.e., modular or lockstep, in _clock_ hours

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

- Schools must certify these courses as separate enrollment periods, i.e., each block or unit shown separately with beginning and ending dates of each block or unit

- Still must show actual last date of attendance when a student's enrollment is ended and the enrollment period must be terminated

Schools operating on a block/unit/modular/lockstep basis in *clock* hours (continued)

Where a program is bundled, i.e., consists of a group of individual objectives which may be approved on their own because they are an objective on their own:

- Each individual objective with its own certificate of completion must be certified with its own start and stop date as well as tuition and fees

- Such individual objectives may be approved as separate courses on their own (we will also defer to the SAA and Commission for Independent Education (CIE) site

If individual components as described above do not lead to an objective and certificate on their own, they **cannot** be approved on their own

Schools <u>Not</u> operating on a block/unit/modular/lockstep <u>or</u> on a term basis – i.e., open enrollment/competency based

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

Programs that may fit this classification:

- Cosmetology

- Barbering

- Auto Mechanics

- Truck Driver Training

Students just starting the course, and others ready to complete the same course, will be in the same classroom/shop at the same time with the same instructor. For such courses, an SOP may require specific grades/scores at the end of each grading period with probationary periods of one (1) or two (2) grading periods.

Schools <u style="color:red">Not</u> operating on a block/unit/modular/lockstep <u>or</u> on a term basis – i.e., open enrollment/competency based (continued)

The starting date of a student's enrollment for schools not operating on a term basis must be the actual 1st day the program/course is scheduled to commence

- Must be tied to an actual date of attendance
- Must *amend* the date if it is different from what was initially certified, i.e., the d+ate the student first attended class
  - If student is absent the first scheduled day of class, VA cannot pay benefits for that day, i.e., VA does not pay for a student to start with an absence or absences.
  - Impacts payment for all chapters since there is no longer break pay

Schools <u>Not</u> operating on a block/unit/modular/lockstep <u>or</u> on a term basis – i.e., open enrollment/competency based (continued)

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

- For completion of the program, *<u>Amend</u>* the date if it is before the anticipated date *(no action is necessary if the date is after)*
- If the beneficiary withdraws, *<u>Terminate</u>* the enrollment and report the effective date as the last date of attendance/activity
- For unsatisfactory attendance or progress, *<u>Terminate</u>* the enrollment and report the effective date as the last day the student was in class prior to violating the attendance or standards of progress policy

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

Certify the **actual** amount of tuition charged (at the in-state rate) <u>less/minus/deduct</u> any scholarships, discounts, waivers, or other payments directly to or by the school and *earmarked for Tuition and Fees Only*

This does <u>not</u> include any Title IV payments, even if specifically for tuition and fees

> By law, VA education payments and payments under Title IV do not impact each other in any way

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

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

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

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

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

The school must ensure the enrollment to VA reflects total charges of $2,500 and VA will then pay $1,250.

Certify <u>Only Allowable Fees/Mandatory Charges</u>

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

- Be listed in the school's approved catalog as a fee;

- Be listed on the student invoice/payment ledger as a fee;

- Be listed in the enrollment agreement/contract between the student and school as a fee;

- Not be considered a preadmission or penalty fee; and

- Be *mandatory* or otherwise *required* of all similarly circumstanced students, *without exception*

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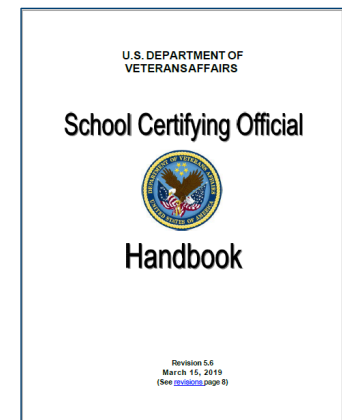
Certifying Tuition & Fees
Chapter 33

Fees that may be certified
(Not all inclusive)

- **Student Services Fees**
- **Technology Fees**
- **Lab Fees**
- **Mandatory Graduation Fees**
- **Health Insurance Premiums (if not waived)**

Fees that may not be certified
(Not all inclusive)

- **Application Fees**
- **Books***
- **Transportation**
- **Food**
- **Lodging**
- **Penalty Fees**
  - **Late Registration, late course changes, make-up hours, etc…**

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

Credit for Previous Education & Training

Schools must ask students to list/provide all previous education and training

- To include where they attended, when they attended and in what program(s) they were enrolled
- Do not ask the student if they *want* any credit transferred in – irrelevant; mandatory and the students have no choice in the matter

Schools must evaluate that education and training and grant credit as appropriate to the school's published and approved standards

- **Must obtain official transcripts**
  - Regardless of whether student previously utilized VA benefits
  - Official transcripts required because schools do **not** grant *official* credit based on *unofficial* transcripts
  - Don't forget to obtain military transcripts

Credit for Previous Education & Training

Review for Prior Credit

One of the **criteria for approval** of any school for Veterans' training is that it **review prior credit and grant credit as appropriate** to a VA student's current program. This is found in Title 38, Code of Federal Regulations, Sections 21.4253(d)(3) and 21.4254(C)(4). In essence, this requires every approved school to **have and enforce a policy** with regard to transfer courses, credits, and previous experience.

Schools no longer have to report prior credit to VA through VA-ONCE; however, schools **must**:

- **Evaluate** previous education and training for prior credit;
- **Grant** credit as appropriate;
- **Notify** the student of the evaluation;
- **Shorten** the program certified accordingly; and
- **Reduce** the tuition and fees proportionally for chapter 33 students

Attendance Policy

Know and understand your SAA-approved attendance policy

It may be different than the policy for your other students

- Requires definite points in time in which action must be taken
  - Verbiage such as "may be" or "could be" are not acceptable
  - Terms such as "shall be" or "will be" are acceptable

Policy for VA students may be a percentage of course hours or total number of absences

Attendance Policy
Monitoring and Record Keeping

Ensure you are monitoring VA students' attendance

Maintain detail in file
We must see a record of:
- every day the student was scheduled;
- the number of hours per day the student was scheduled; and
- how many hours the student actually attended.

Attendance records must be a daily record of the student's actual attendance and must be "positive" rather than "negative" records
- Negative attendance records (marking only when the student is absent) are <u>not</u> acceptable

Must maintain attendance records for each class for:

- All NCD programs measured on a clock hour basis; and
- Those offered at an IHL that are measured in credit hours and are not an integral part of a standard college degree where attendance is required

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

Attendance Policy

Enforce the policy if a student fails to meet attendance standards

Student's benefits must be terminated if s/he violates attendance standards, i.e., your policy must be followed to the letter without exception

Ensure you submit within 30 days of the student's last date of attendance (LDA) prior to violating the attendance policy. The LDA is the effective date of the termination.

Example

A student who, for any reason, misses more than 15% of the total **scheduled** course hours in a calendar month is considered to be in violation of the attendance policy and will be placed on attendance probation for one (1) month for unsatisfactory attendance.

If the student fails to meet attendance standards the following month, her/his unsatisfactory attendance will be reported to VA via a termination.

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

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

- If the actual last day of attendance is *after* the ending date certified, no action is necessary. Do not submit adjustments for absences that are allowed within the school's approved attendance policy.

- You may **not** extend enrollment for students who need additional hours simply because of absences.

Reporting a "Confirmed" Leave of Absence

Amend the end date

- Submit an *Amendment* to the student's original enrollment certification changing the end date of the enrollment period to match the "new" projected graduation date after adjusting for the LOA

Insert a remark

- In the "remarks" section in VA-ONCE, under "Other," enter: "Student was on LOA [enter dates]"
  – The student will not be paid benefits during this period of leave

If the student does not return, submit a *Termination* using the last date of attendance.

Leave of Absence (LOA)

Reporting a "Non-Confirmed Return Date" Leave of Absence

Terminate the Certification
- Withdrawal or Interruption (NCD Programs Not on a Term Basis)
- Effective date is the LDA (last date of attendance)

Insert a Remark
- In the "Remarks" section in VA-ONCE, under "Other," enter: "Student is on LOA Effective [enter dates]"

Once the student actually returns:
- Submit a new certification 22-1999 with return date as the Begin Date
- Give credit for previous training time (reduces original enrollment period by the number of clock hours completed)
- Report "new" projected graduation End Date
- Remark: Student returning from Leave of Absence

Corrections to a Certification

A Notice of Change in Student Status reports one of three distinct actions:

- ➢ Amend
- ➢ Adjust
- ➢ Terminate
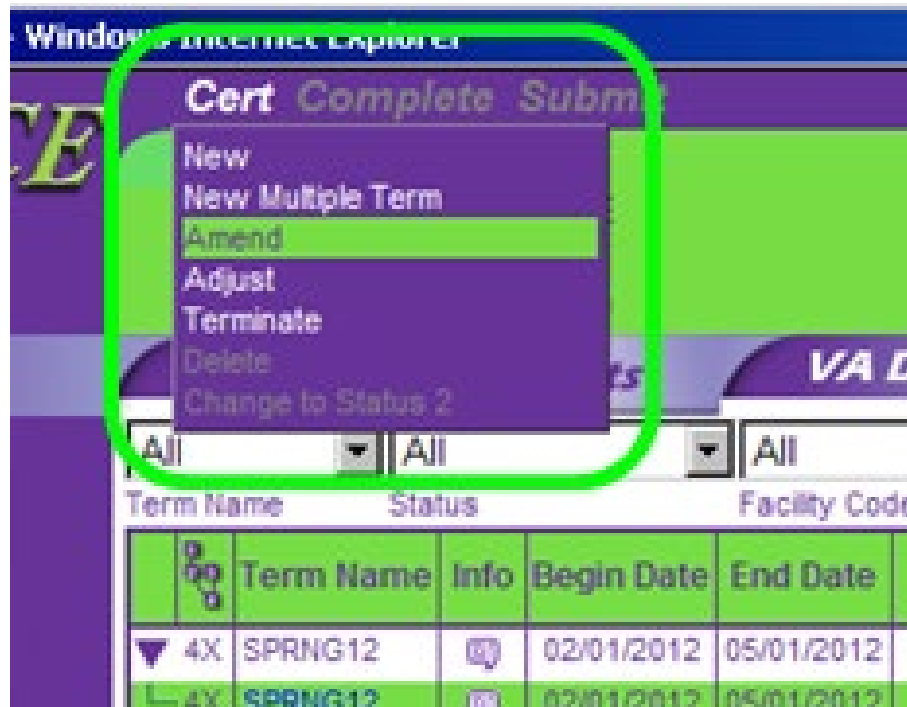
Corrections to Certifications

Amend: Used to change begin date, end date, tuition and fees, and modify/add a remark on a certification already submitted

Adjust: Used to report an increase or decrease in credit hours. If tuition and fees were reported, they must also be changed to correspond to the adjusted number of credit hours

Terminate: Used to report a complete withdrawal from an enrollment period, or to report graduation or program completion

Certifying Enrollment Periods

How does it work if the program operates on a term or lockstep/modular basis?

For term or lockstep/modular programs:

Certify enrollment for each term and each module/class separately

The total clock hours certified must not exceed the number of clock hours for which the program is approved

If a student fails a module/class and the student must repeat the module/class, then you may certify the enrollment of the student in that module/class again

- When doing so, you may place a *Remark* that the student is retaking a module/class that that s/he had failed

Certifying Enrollment Periods

Schools <u>not</u> operating on a block or unit basis or on a term, semester, or quarter basis

- Tuition and fees are generally paid up front; however, some schools do have incremental billing
- Students are issued their certificate of completion once they learn all the competencies taught in the program
- VA may pay to the point the student completes the program, up to the number of hours approved by the SAA, and within the approved standards of academic progress, attendance, and conduct.

Remember:

Schools must have and enforce adequate standards of progress and must report termination of attendance when a student fails to maintain satisfactory progress in terms of the school's own SAA approved and published academic standards.

Know and understand your SAA-approved Standards of Progress policy for VA students (relates to graduation requirements)

Monitor VA students' academic progress

– **There must be a clear, definite point in time when:**

- VA student will be placed on probation (cannot be indefinite)
- Report probation through VA's "Ask a Question" via the Internet Inquiry System: https://gibill.custhelp.com (see page 83 of the online SCO handbook)
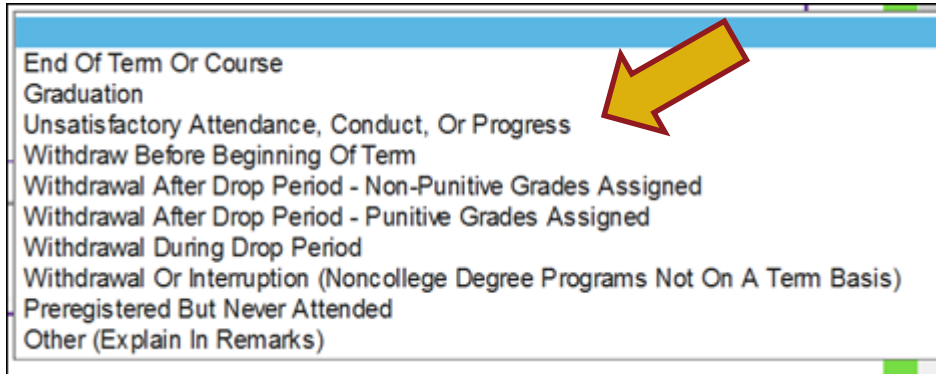
School Official Completes							
Benefit Chapter	SSN/File Number	Payee	Last Name	First Name	Facility Code	Start Date Academic Probation	Zip Code Current Address

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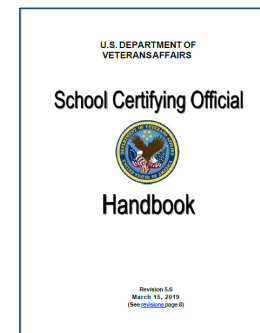
Law requires VA educational benefits be discontinued when student fails to make satisfactory progress toward completion of training objective (Title 38, USC § 3675(b)(1))

Terminations

Select this reason for failure to meet the school's Standards of Attendance, Conduct, or Progress. Show the last date attendance, conduct, or progress was satisfactory.

Termination Information: **Unsatisfactory attendance, conduct, or progress**
Date of Termination: **05/23/2018**
Late Date Credit Accrued: 05/23/2018
Period Beginning: **01/05/2018**
          Ending: **05/30/2018**

Last Date Credit Accrued field is **optional** for some termination reasons.
If it's not optional, you will know – VA-ONCE will alert you that you must enter date

Last Date of Attendance:

The actual last date the student was physically in class

Last Date Credit Accrued (For NCDs Only):

The last date the student accrued credit toward graduation/completion of program

Applicable for both competency-based programs (open entry, open exit, not operating on a term or block/lockstep/modular basis) and programs that operate on a term or block/lockstep/modular basis
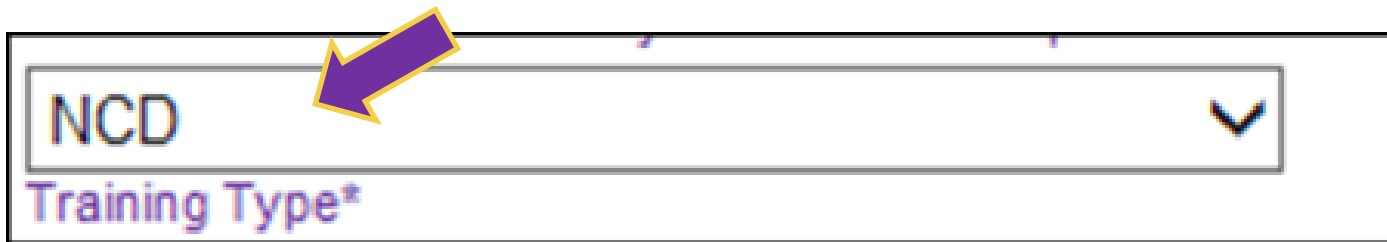
Terminations

When "NCD" is selected as type of training on BIO page in VA-ONCE
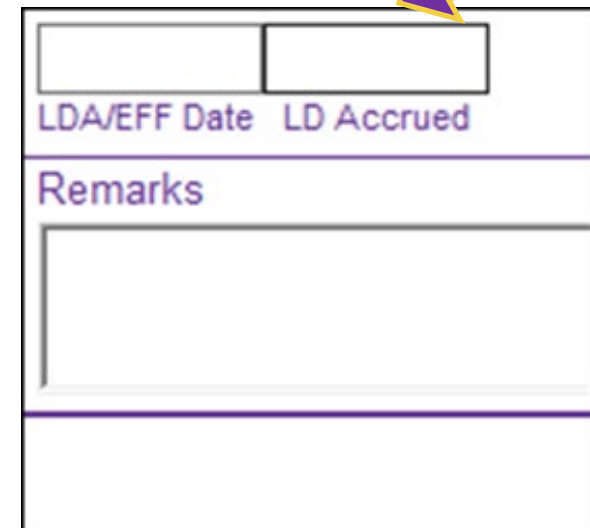
Depending on the termination reason selected, VA-ONCE may require an entry

Reporting Program Completion:

Schools should report graduation or program completion information to VA. Once a student graduates from a degree program or completes a Non-College Degree program, submit a Notice of Change in Student Status via the Termination process in VAONCE

If the student is graduating from a 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 ending date of the enrollment period will be pre-populated as the date of termination.

Point of Clarification:
For competency-based programs (open entry, open exit, not operating on a term or lock-step/modular basis), if the student successfully completes the program and the actual last day of attendance is before the ending date certified, an amendment reflecting the earlier date must be submitted.

Mitigating Circumstances

Events that are **unavoidable (i.e., beyond the student's control)** **and** **unexpected** which directly interfere with a student's pursuit of a course. Students must submit corroborative evidence to the SCO to substantiate their reasons for being unable to complete a course or courses, or receiving a nonpunitive grade

Mitigating Circumstances

The following are examples of circumstances VCEs have accepted as mitigating

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.

Mitigating Circumstances

The following are examples of circumstances VCEs have accepted as mitigating

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.

Discontinuance of the course by the school.

Mitigating Circumstances

Mitigating Circumstances

The most effective way for students to provide mitigating circumstances is to submit them to their School Certifying Official, along with notification of the dropped course/s.

Report the drop via VA-ONCE, enabling VA to review the mitigating circumstances and reduce/terminate the benefits in one action.

If mitigating circumstances are an issue for the adjustment or termination reason you select, VA- ONCE will display a Mitigating Circumstances box. The drop down arrow for the box will display the above list of mitigating circumstances. If you know the circumstance and it's clearly one of the circumstances listed, then select that circumstance. Documentation of mitigating circumstances provided by the student should be retained within the student's file.

If you do not have documentation of the student's circumstance, then leave the mitigating circumstance box blank. If you leave the mitigating circumstance box blank, VA will ask the student to provide evidence of a mitigating circumstance.

6-Credit Hour Exclusion

VA automatically grants mitigating circumstances for up to 6 credits the first time a student reduces or terminates and mitigating circumstances must be considered

The examples and references you will see in the SCO Handbook and GI Bill® website regarding 6X will be in credit hours; however, the exclusion also applies to courses measured in clock hours

For the purpose of 6X, the following will be considered the equivalent of 6 credit hours:

6X

Six (6) semester or quarter hours

Nine (9) clock hours if the course is measured on a clock hour basis with **18 clock hours** equal to full-time training. This applies to a non-degree program offered on a term, semester, or block basis.

Eleven clock hours if the course is measured on a clock hour basis with **22 clock hours** equal to full-time training. This applies to a non-degree program offered on a term, semester, or block basis