



Education Service

September Office Hours

School Certifying Officials

September 2021



Choose  A

# Debt Management Center (DMC) – School Debts



Julie Lawrence

Chief, Treasury Education External Relations Division  
Debt Management Center



# Background

- All collection action on VA debts under the jurisdiction of the U.S. Department of the Treasury was suspended until September 30, 2021
- Institutions (schools) continued to receive the normal series of debt letters
- Referrals to the Treasury Offset Program were not paused for schools



# Resuming Collection Activities- Schools



- U.S. Department of the Treasury activity will resume in October 2021 for debts under their jurisdiction
- DMC recommends schools request a debt list by facility code to ensure no debts have fallen through the cracks and aged
  - Email [dmcedu.vbaspl@va.gov](mailto:dmcedu.vbaspl@va.gov) to request a debt list by facility code



# How To Contact TOP

- Schools may contact TOP by calling the TOP Call Center at
- **1-800-304-3107**
- Treasury will verify that a caller is in a need-to-know position with the institution/school
- Treasury will need to know at least one of the following:
  - date of the payment
  - amount of the original payment
  - amount of the offset
- Make sure to obtain the Debt Account ID related to the offset from Treasury (typically ends in 0075 for school tuition) before contacting DMC about an offset



# Options for School Debt Resolution

## Payment Options



- Pay in Full
- Dispute
- Payment Plan
- Compromise

- If an institution/school is experience difficulties with repayment, please email [dmcedu.vbaspl@va.gov](mailto:dmcedu.vbaspl@va.gov)



# DMC School Official Debt Line

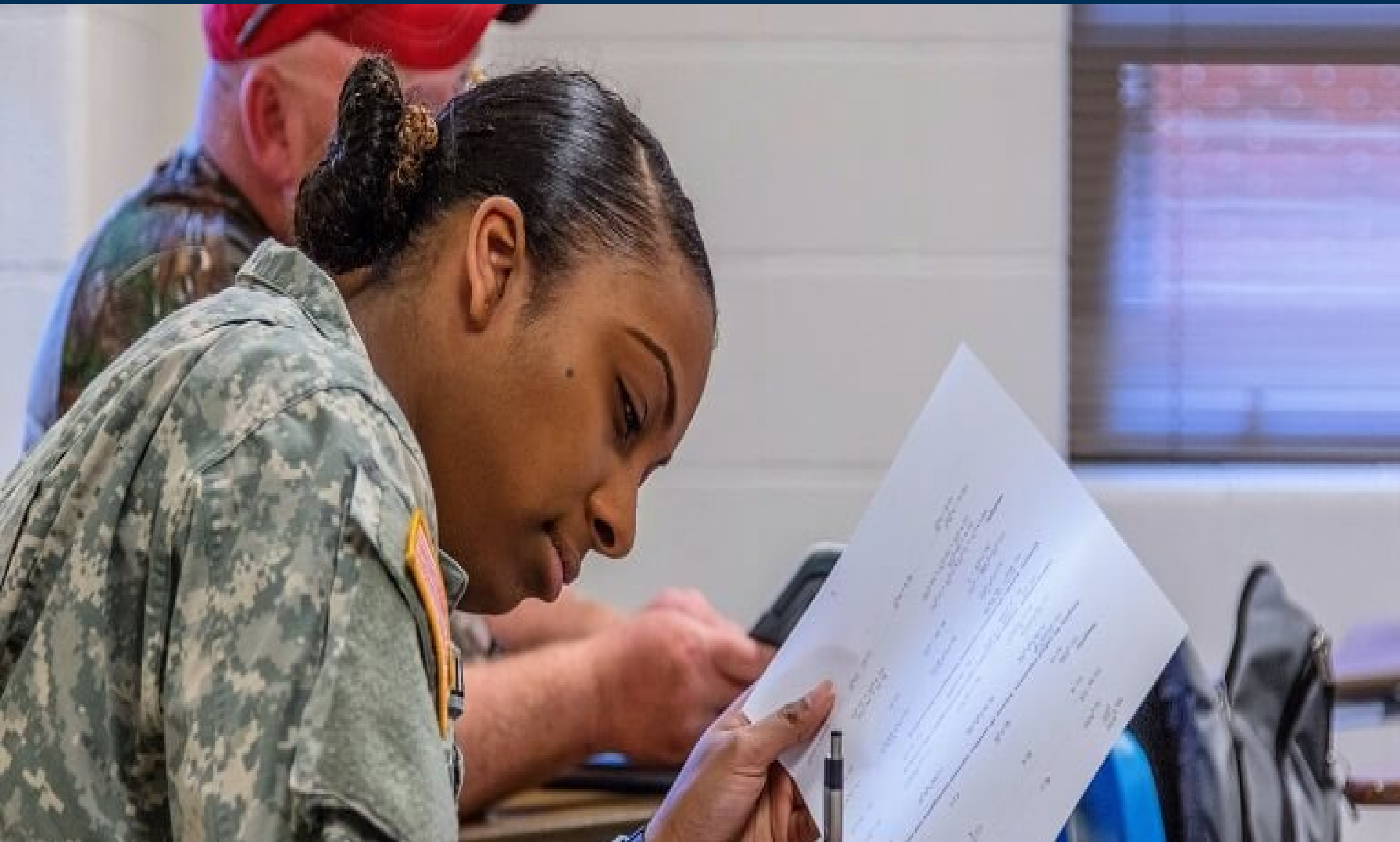
## Contact Information



- 833-720-2574 (international 612-843-6508)
- Use for questions on Post 9/11 GI Bill® Tuition and Fees debts such as:
  - Term dates for a debt
  - Confirm a payment was received
  - Confirm an outstanding balance
  - Assistance with an online payment
- Disputes regarding the existence or amount of the debt should be sent via email to [dmcedu.vbaspl@va.gov](mailto:dmcedu.vbaspl@va.gov)

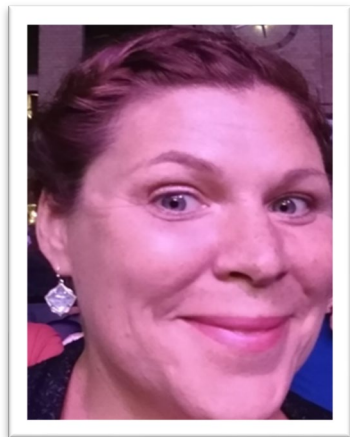


# Knowledge Check





# VRRAP-Reminders



Marit Solem  
Training Specialist  
National Training Team- Schools



# VRRAP-Reminders



- Reminder, a submission via VAONCE is required upon graduation to receive the “Program Completed” portion of the payment
- The VRRAP team will be verifying employment details submitted for final payments





Kate Caruso  
Management and Program Analyst  
DGIB Procedures

## 85/15 Rule & 35% Exemption

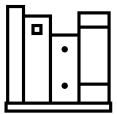


Cynthia Kujawski  
Management and Program Analyst  
DGIB Procedures



# 85/15 Rule

## What Is The 85/15 Rule?



- The 85/15 Rule prohibits paying Department of Veterans Affairs (VA) benefits to students enrolling in a program when more than 85% of the students enrolled in that program are having any portion of their tuition, fees, or other charges paid for them by the Education and Training Institution (ETI) or VA under Title 38 or Title 10
- If the ratio of supported students to non-supported students exceeds 85% only students maintaining continuous enrollment may receive benefits for that program

**Note:** Students receiving Veteran Readiness and Employment (Chapter 31), or Survivors' and Dependents' Educational Assistance (Chapter 35), benefits must be counted when calculating 85/15 Rule compliance, but they can continue to be certified and enrolled if the ETI is found to be in violation of the 85/15 Rule.



# 85/15 Rule

## Why Does The 85/15 Rule Exist?

- To ensure that a minimum number of students, who are not receiving VA funds, are willing to pay for the full cost of the program
- To ensure the price of the program responds to the general demands of the open market and that the minimal number of non-VA beneficiaries find the program to be worthwhile



# Reporting Requirements

## When Do Routine 85/15 Calculations Need to Be Provided?

If the ETI is **structured on a Term, Quarter, or Semester Basis:**



85/15 calculations must be submitted to the Education Liaison Representative (ELR) of jurisdiction no later than 30 days after the start of each regular term (excluding summer terms)

### EXAMPLE:

**Spring Term start date:** January 3, 2022  
**85/15 Report due:** February 1, 2022

**Fall Term start date:** September 6, 2022  
**85/15 Report due:** October 5, 2022

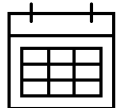




# Reporting Requirements

## When Do Routine 85/15 Calculations Need to Be Provided?

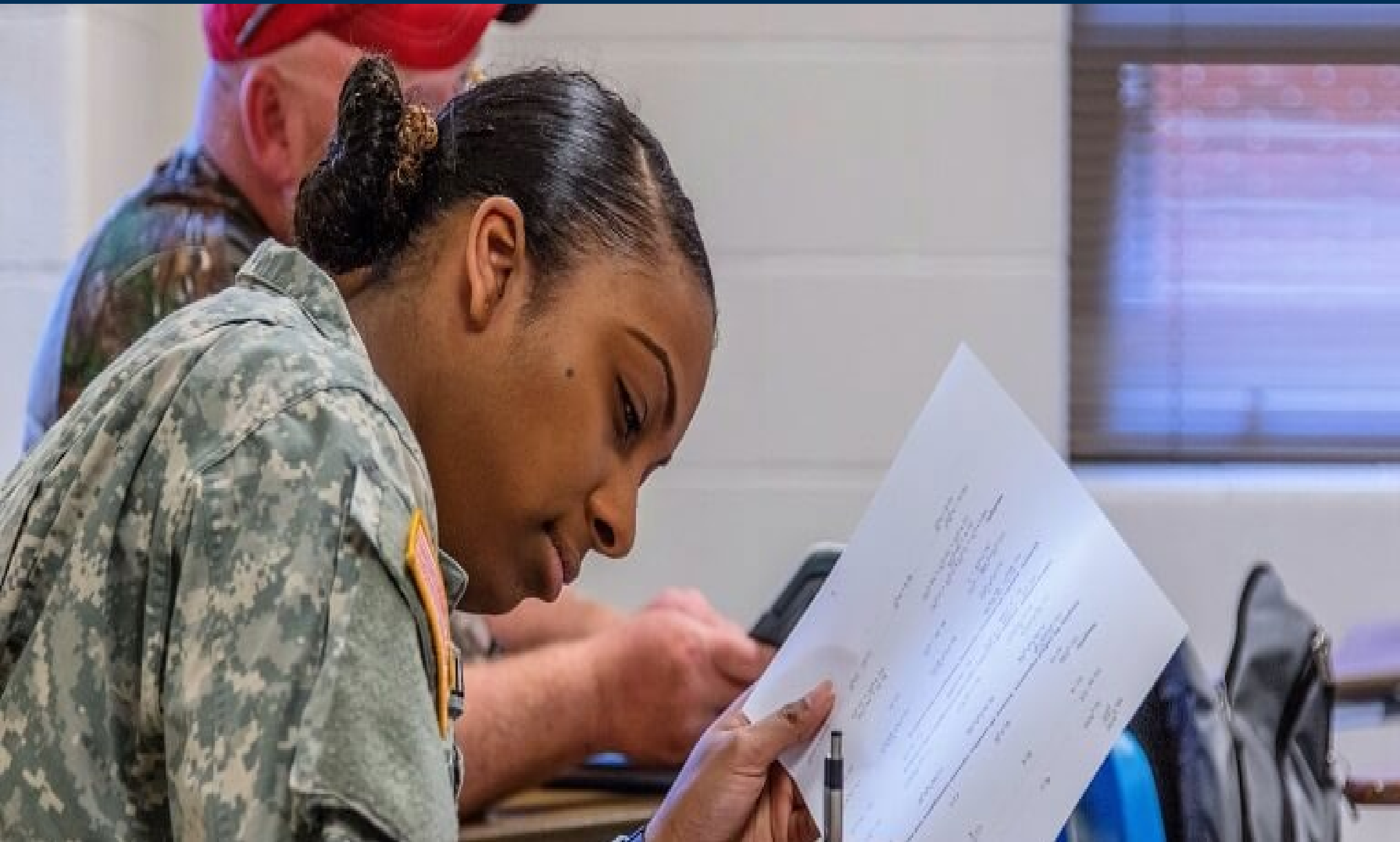
- If the ETI is **not structured on a Term Basis**, then –
  - 85/15 calculations must be submitted to the ELR of jurisdiction no later than 30 days after the beginning of each calendar quarter
  - Calendar quarters align with the quarters of VA's fiscal year which starts in October and ends in September.
  - Calculations must be submitted for all enrollment periods in the previous calendar quarter
- Due dates for routine reporting of 85/15 calculations will be as follows:



Due Date	Enrollment Periods Beginning Between
January 30 <sup>th</sup>	October 1 through December 31
April 30 <sup>th</sup>	January 1 through March 31
July 30 <sup>th</sup>	April 1 through June 30
October 30 <sup>th</sup>	July 1 through September 30



# Knowledge Check





# 35% Exemption



# 35% Exemption

## What is the 35% Exemption?

- An ETI with a 35% Exemption is not required by regulation to routinely report 85/15 calculations to VA
- 85/15 calculations must still be provided at the request of VA or State Approving Agency staff

## 35% Exemption Criteria

- The total number of VA beneficiaries enrolled in the educational institution must be less than or equal to 35% of the total student enrollment.

NOTE 1: Any program(s) that exceed 85% supported student enrollment are not exempt and the ETI must continue to monitor and routinely report enrollment data on any programs not included in the 35% Exemption

NOTE 2: Total student population is NOT based on Full Time Equivalency (FTE)



# 35% Exemption

## 35% Exemption Calculations vs 85/15 Calculations



- **35% Exemption Calculations** are based on actual student enrollment and are calculated based on VA students vs. Non-VA students. (38 CFR 21.4201 [c] [4])
- **85/15 Calculations** are based on full time equivalency and are calculated based on supported vs. non-supported students. (38 CFR 21.4201 [e] [2])



# 35% Exemption

## 35% Exemption Reset

- There will be a national reset to rescind all 35% Exemptions
- This reset is effective October 1, 2021
- VA is resetting the 35% Exemption because recent reviews of 85/15 conducted by VA revealed that a number of ETI were not correctly computing the ratio of supported to non-supported students, especially those ETI with the 35% Exemption

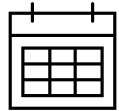


NOTE: If a facility does not currently hold a 35% Exemption, the ETI is still required to provide routine reports as previously outlined



# 35% Exemption

## 35% Exemption – Next Report Due – Non-Term Based ETI




- Since the reset for ETI is effective October 1, 2021, all non-term based ETI must submit 85/15 calculations no later than October 30, 2021. Those calculations, which will cover all enrollment periods for each individual cohort or module, beginning between the dates of July 1 and September 30, 2021
- When non-term based ETI enrollment ratios meet the necessary exemption criteria then the ETI may reapply for the 35% Exemption

NOTE: Per 38 Code of Federal Regulations (CFR) 21.4201 if there is reason to believe that the enrollment of Veterans and eligible persons in the course may exceed 85 percent of the total student enrollment in the course, a 35% Exemption can be revoked at that time



# 35% Exemption

## 35% Exemption – Reapplication - Non-Term Based ETI

- If 85/15 Enrollment Ratios meet the necessary exemption criteria for periods beginning on or after October 1, 2021, then the non-term based ETI may apply for the 35% Exemption
-  ▪ Completed *Statement of Assurance of Compliance with 85 Percent Enrollment Ratios* for each of the enrollment periods occurring within the corresponding reporting period must accompany any application for the 35% Exemption
- A response to the submission will be provided to the ETI within 90 days

NOTE: Per 38 Code of Federal Regulations (CFR) 21.4201 if there is reason to believe that the enrollment of Veterans and eligible persons in the course may exceed 85 percent of the total student enrollment in the course, a 35% Exemption can be revoked at that time



# 35% Exemption

## 35% Exemption – Next Report Due – Term Based ETI



- When the ETI is term based, the reset will be effective October 1, 2021. All term based ETI must submit 85/15 calculations no later than 30 days after the start of the Spring 2022 term, as it is published in the academic calendar
- When IHL ETI enrollment ratios meet the necessary exemption criteria then the ETI may reapply for the 35% Exemption

NOTE: Per 38 Code of Federal Regulations (CFR) 21.4201 if there is reason to believe that the enrollment of Veterans and eligible persons in the course may exceed 85 percent of the total student enrollment in the course, a 35% Exemption can be revoked at that time

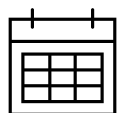




# 35% Exemption

## 35% Exemption – Reapplication – Term Based ETI

- If a term based ETI's 85/15 Enrollment Ratios meet the necessary exemption criteria for terms beginning on or after October 1, 2021, then the ETI may apply for the 35% Exemption
- The earliest date a term based ETI can apply for the 35% Exemption is when the Spring 2022 reporting for 85/15 calculations is submitted. A completed *Statement of Assurance of Compliance with 85 Percent Enrollment Ratios* for the corresponding reporting period must accompany any application for the 35% Exemption
- A response to the submission will be provided to the ETI within 90 days



NOTE: Per 38 Code of Federal Regulations (CFR) 21.4201 if there is reason to believe that the enrollment of Veterans and eligible persons in the course may exceed 85 percent of the total student enrollment in the course, a 35% Exemption can be revoked at that time





# 35% Exemption

## 35% Exemption – Routine Lifecycle Maintenance

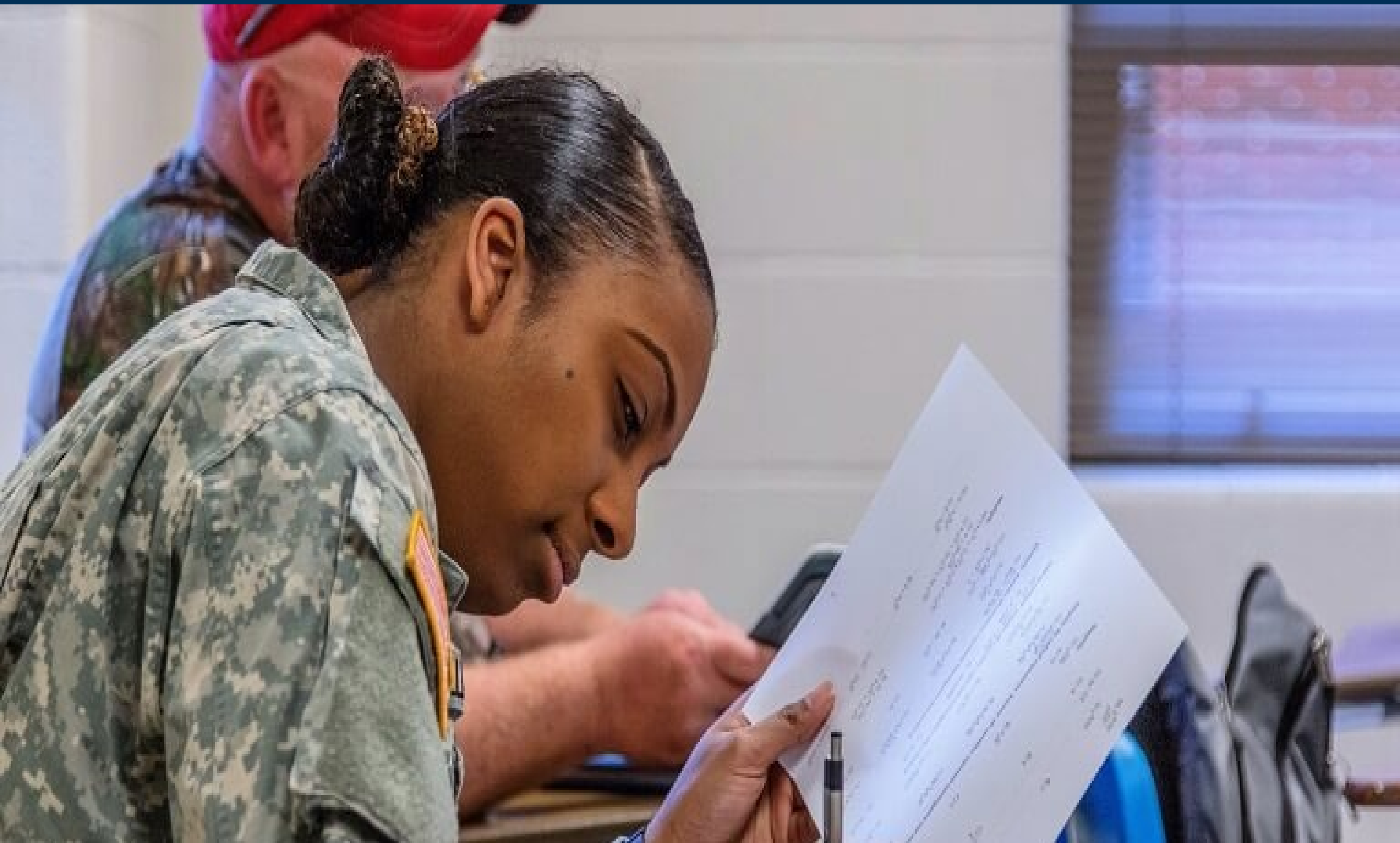
When granted, 35% Exemptions will routinely expire for all ETIs every 24 months:



Facility Type	35% Exemption Must Be Renewed Every
Accredited IHL	24 months
Non-Accredited IHL	24 months
Accredited NCD	24 months
Non-Accredited NCD	24 months

NOTE: Per 38 Code of Federal Regulations (CFR) 21.4201 if there is reason to believe that the enrollment of Veterans and eligible persons in the course may exceed 85 percent of the total student enrollment in the course, a 35% Exemption can be revoked at that time





# Branch and Extension Campuses

## Branch Campuses

Approved campuses that have both administrative capability and a Facility Code must complete 85/15 calculations separate of the main campus of the Educational & Training Institution (ETI)



- Students will be individually counted (based on full-time equivalency at the site)
- This is true for both supported and non-supported students

NOTE: Though issued a facility code, approved teaching sites, commonly referred to as “extension campuses,” typically do not maintain administrative capability and are not approved separate of a parent campus. If you’re unsure whether your campus is approved independently of the main campus, contact your SAA.



# Branch and Extension Campuses

## Extension Campuses

Approved training sites without administrative capabilities (those sites approved and possessing an extension campus facility code) do not require separate 85/15 calculations. The student will be counted under the campus which maintains administrative capability over that training site (i.e., the “parent” campus of the training site) be that the main campus or an approved branch campus. Example:



Approved Campus with Administrative Capability	IHL Main Campus: 1-1-1234-56
Approved Training Site of IHL Main Campus:	Extension Campus A: 1-1-X789-56

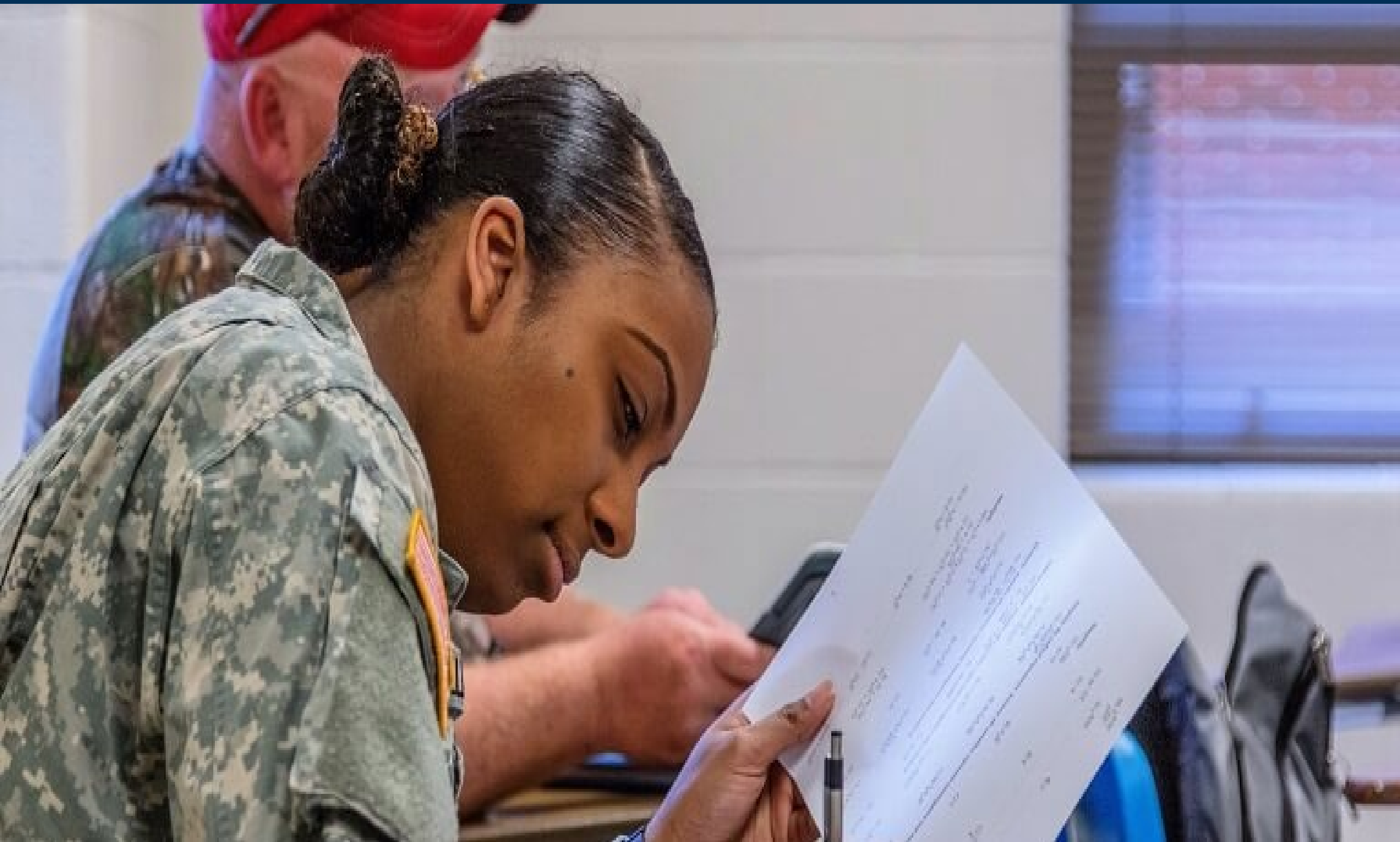
Any enrollments in classes held at Extension Campus A (1-1-X789-56) are included in calculations for programs approved under its parent campus of IHL Main Campus (1-1-1234-56)

Approved Campus with Administrative Capability	IHL Branch Campus: 1-1-8101-56
Approved Training Site of IHL Branch Campus:	Extension Campus B: 1-1-X234-56

Any enrollments in classes held at Extension Campus A (1-1-X789-56) are included in calculations for programs approved under its parent campus of IHL Main Campus (1-1-1234-56)



# Knowledge Check



# Concentrations and Specializations

## Dual Majors and Dual Degrees



- Students enrolled in multiple majors must be counted for each major in which they are enrolled
- Students enrolled in multiple degrees, in the case that the multiple degrees are not approved by the State Approving Agency of jurisdiction as a single program, must be counted in each separately approved degree

This is true for both supported and non-supported students. Each is counted as a full-time or part-time students under each major based on the total number of credits the student is pursuing during the enrollment period.





# Concentrations and Specializations, cont.

## Concentrations and Specializations



- Students must be counted for each concentration and track in which they are enrolled. Per 38 Code of Federal Regulations (CFR) 21.4201(e)(1), a course or curriculum that varies in any way from a similar course, although it may have the same designation, requires a separate 85/15 percent computation
- Consequently, separate 85/15 computations are required when there is any difference in the educational/vocational objective, length, cost, or equipment of a program based on the concentration or track

This is true for both supported and non-supported students. Each is counted as a full-time or part-time students under each concentration based on the total number of credits the student is pursuing during the enrollment period.



# Concentrations and Specializations, cont.

## Differing Modalities



- If a program with the same name is offered through different modalities (e.g., in-residence, online, blended, etc.) and the requirements vary (such as differences in attendance requirements, unit subjects, required completion length, required charges, etc.), then the differing modalities must be separately listed and calculated for 85/15 Rule purposes

This is true for both supported and non-supported students. Each is counted as a full-time or part-time students under each modality based on the total number of credits the student is pursuing during the enrollment period.





# Concentrations and Specializations, cont.

## Concentrations and Modalities Interaction



Separate 85/15 calculations are required whenever there is a difference in the length, cost, or equipment of a program. It is possible if there are differing modalities, in concentrations, that these would require their own individual 85/15 calculations

This is true for both supported and non-supported students - and are counted as a full-time or part-time students under each modality/concentration based on the total number of credits the student is pursuing during the enrollment period.



# Supported Students and Non-Supported Students

## Supported Students

- Any student receiving any amount of VA Education benefits under Title 38 or Title 10
- Any student where the full amount of tuition, fees, and other mandatory charges has not been paid to the ETI prior to the reporting date (i.e., no later than 30 days from the start of a term or 30 days after the end of quarter), unless **all** of the following apply
  - The availability and requirements of the payment plan policy is published both on the ETI's website and in the ETI's approved catalog
  - The payment plan is available to any enrolled student interested in participating in such plans
  - The payment plan explicitly requires the student to pay the outstanding balance by the end of the 85/15 reporting period (academic term or calendar quarter)
  - The payment plan policy prevents the student from training beyond the reporting period unless the outstanding balance is paid in full
- Any student who is granted any waiver or forgiveness of tuition, fees, or other charges
- Any student who receives an institutionally funded scholarship or grant, if the institutional policy for determining the recipient of such aid is not equal with respect to Veterans and nonveterans alike, excluding graduate students (i.e., restricted aid)



# Supported Students and Non-Supported Students

## Non-Supported Students

- Any student who pays the full amount of tuition, fees, and other mandatory charges to the ETI prior to the end of the current reporting period (i.e., no later than 30 days from the start of a term or end of quarter)
- Any student using an institutionally funded payment plan to pay the full amount of tuition, fees, and other mandatory charges when all the following apply:
  - The availability and requirements of the payment plan policy is published both on the ETI's website and in the ETI's approved catalog
  - The payment plan is available to any enrolled student interested in participating in such plans
  - The payment plan explicitly requires the student to pay the outstanding balance by the end of the 85/15 reporting period (academic term or calendar quarter)
  - The payment plan policy prevents the student from training beyond the reporting period unless the outstanding balance is paid in full
- Any student receiving Title IV Department of Education aid
- Any student receiving Tuition Assistance through the Department of Defense
- Any student receiving non-institutional aid (scholarships, grants, or other types of aid offered by a third-party entity not affiliated with the ETI)
- Any student receiving an institutionally funded loan, scholarship, or grant, if the policy for determining the recipient of such aid is equal with respect to Veterans and nonveterans alike (i.e., unrestricted aid)
- Graduate students in receipt of institutional aid

NOTE: If the student is receiving multiple types of aid and any of it is supported, the student must be counted as a supported student



# Supported Students and Non-Supported Students

## Third Party Aid



Students receiving third party aid from a source not affiliated with the ETI can be counted as a non-supported student, unless they possess another criteria which requires the student to be counted as a supported student

This would include, but is not limited to, third party scholarships, grants, employer education reimbursement, etc



# Supported and Non-Supported Students

## Third Party Aid Examples



- Students receiving Department of Education (Title IV, FAFSA) loans or grants will be counted as non-supported students
- Students receiving Department of Defense (Tuition Assistance, MyCAA) funds will be counted as non-supported students

NOTE: If the student is receiving multiple types of aid and any of it is supported, the student must be counted as a supported student



# Supported Students and Non-Supported Students

## Institutional Scholarships



- Undergraduate students who receive an institutionally funded scholarship or grant must be counted as a supported student if the policy for determining the recipient of such aid is designed or applied in an unequal way with respect to Veterans and nonveterans alike (i.e., restricted aid)
- Students in graduate-level programs may receive restricted aid and can still be counted as non-supported students





# Supported Students and Non-Supported Students

## Institutional Scholarships

### Example 1

- Example of **restricted aid** - Children of faculty members at ABC University receive a scholarship for full tuition reimbursement. If the child is eligible for aid from any other source (such as by being a GI Bill® beneficiary), the student is only allowed to utilize one source of aid



- All students receiving the restricted aid must be counted as **supported students**
- Example of **unrestricted aid** – Children of faculty members at ABC University receive a scholarship for full tuition reimbursement. This applies to all children of faculty members, including children using VA benefits
  - Students receiving the unrestricted aid, and do not possess another criteria which requires the student to be counted as a supported student, must be counted as **non-supported students**



# Supported Students and Non-Supported Students

## Institutional Scholarships

### Example 2

- Example of **restricted aid** - The ETI obligates that a student decline all institutional aid (such as merit or athletic scholarships) in order to be certified for Yellow Ribbon benefits



- Any student receiving institutional aid which a student receiving Yellow Ribbon could not receive, must be counted as a supported student





# Supported Students and Non-Supported Students

## Discounts, Waivers, And Tuition Forgiveness



- If the ETI is **granting a reduced tuition and fees** (essentially a discount) to **all students in a program** then this would not be restricted aid, and students receiving this discount (and no other type of supported aid) would continue to count as non-supported students
- If the ETI is **granting a waiver or tuition/fees forgiveness selectively** (all students in a program were charged X amount, and only some students are being granted the lesser charges), then students receiving the waiver or forgiveness would need to be counted as supported students for that term



# Supported Students and Non-Supported Students

## Discounts, Waivers, And Tuition Forgiveness

### Example 1



- All firefighters are given a discounted tuition of \$500.00
- Students who are firefighters and are using GI Bill® benefits are given the discounted tuition of \$500.00
- Students receiving this discount, and do not possess another criteria which requires the student to be counted as a supported student, must be counted as **non-supported students**



# Supported and Non-Supported Student

## Discounts, Waivers, And Tuition Forgiveness

### Example 2

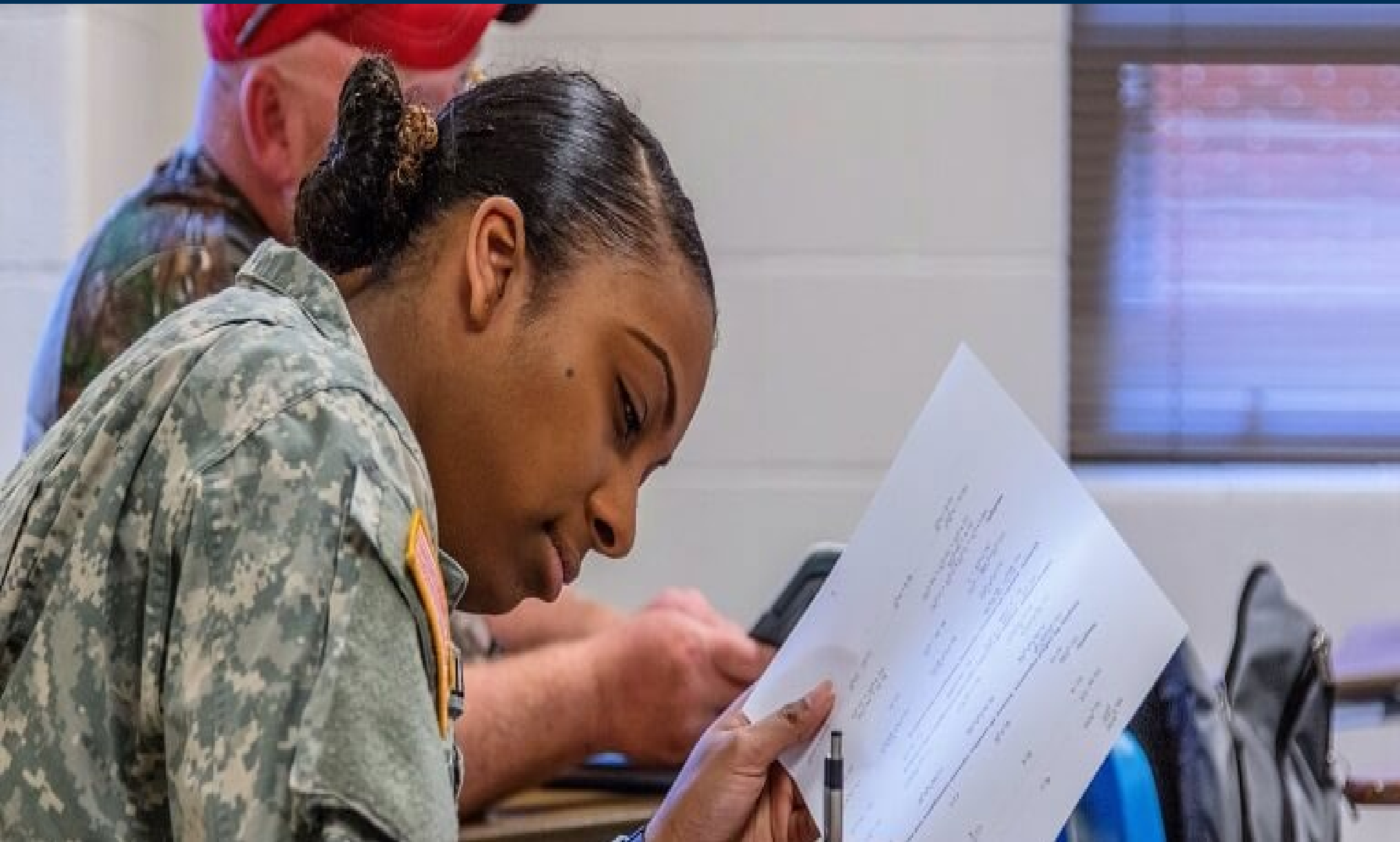
- As a result of COVID-19 all students who were attending in-residence are converted from an in-residence to an online modality and are provided a discounted tuition of \$500.00
- Students who were attending in-residence and are using GI Bill® benefits are given the discounted tuition of \$500.00
- Students receiving this discount, and do not possess another criteria which requires the student to be counted as a supported student, must be counted as **non-supported students**



**\*\*NOTE:** There is now a change in cost due to modality – so if the online modality wasn't specifically broken out previously, it must be now



# Knowledge Check



# Overlapping Modular/Cohort Reporting

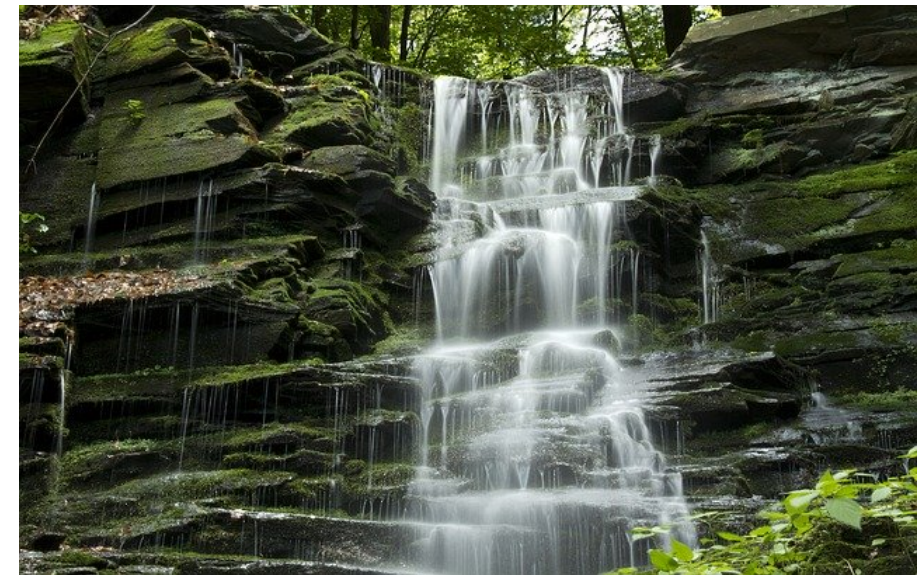
## Overlapping Modules/Cohorts

Routinely speaking Non-College Degree (NCD) programs are structured on a modular or cohort basis where terms may overlap each other. There are also some Institutions of Higher Learning (IHL) that are structured to offer all programs this way.

Note: This does not refer to programs offered on a term basis, such as those offered in “mini-mesters” at an otherwise traditionally term-structured institution

This means that when calculating 85/15 for these types of programs, the school administrators will review and report on all students enrolled in a program at the start of each module or cohort

It helps to visualize this as a cascading effect with one pool of students graduating from one module into another larger pool of students and so on.....





# Overlapping Modular/Cohort Reporting

## Overlapping Modules/Cohorts (1 of 3)

- NCD ETI has one approved program (*Example program*) which has the following cohort dates:

*Cohort One* - 01/01/2021 – 07/01/2021

*Cohort Two* - 02/01/2021 – 08/01/2021

*Cohort Three* - 03/01/2021 – 09/01/2021

- The ETI must review 85/15 compliance as it begins enrolling students in *Cohort One* (01/01/2021 – 07/01/2021) to ensure that it's supported student population remains in compliance with the requirements of the 85/15 Rule
- The ETI enrolls 5 students using GI Bill® benefits (supported students) and 1 student completely self-paying who pays the full tuition and fees before the first day of class (non-supported student)
- The current 85/15 calculation for Example program is 83.33%





# Overlapping Modular/Cohort Reporting

## Overlapping Modules/Cohorts (2 of 3)

- When enrolling students for *Cohort Two* (02/01/21 – 08/01/21) the ETI must review 85/15 compliance by including all students who are still attending, so all new students and all still enrolled students in *Cohort One* (01/01/21 – 07/01/21), which must be factored into the calculation. So, because a new supported student would put the ETI out of compliance with 85/15 (it would be 6 supported students and 1 non-supported student which would make the 85/15 percentage 85.71%), the site would be unable to certify a new supported student until a new non-supported student enrolled
  - For *Cohort Two* (02/01/2021 – 08/01/2021) ETI enrolls 2 students who are completely self-paying (non-supported students) and 4 students using GI Bill® benefits (supported students)
  - Because the cohorts overlap, all students are calculated together for a total of 9 supported students and 3 non-supported students
- The current 85/15 calculation for *Example Program* is 75%



# Overlapping Modular/Cohort Reporting

## Overlapping Modules/Cohorts (3 of 3)

- When enrolling students for *Cohort Three* (03/01/2021 – 09/01/2021) the ETI must review 85/15 compliance by including all students who are still attending; so, all of the students enrolled in the current cohort and students still enrolled from the earlier cohorts, *Cohort One* (01/01/2021 – 07/01/2021), and *Cohort Two* (02/01/2021 – 08/01/2021) must be factored into the calculation
  - For *Cohort Three* (03/01/2021 – 09/01/2021) the ETI enrolls 0 students who are completely self-paying (non-supported student) and 2 students using GI Bill® benefits (supported students)
  - Because the cohorts overlap, all students are calculated together for a total of 11 supported students and 3 non-supported students
- The current 85/15 calculation for *Example Program* is 78.57%



# Changes in Enrollment

## Changes In Enrollment

Changes in enrollment which happen on or after the first day of term do not require 85/15 calculations to be amended and resubmitted. This may have a ripple effect for the following term.

Changes in enrollment where students preregistered but never attended do require 85/15 calculations to be amended and resubmitted



# Changes in Enrollment

## Changes In Enrollment Example

- VA-ONCE IHL ETI has one approved program (*Example program*) which has the following term dates:

Fall Term 2021	09/07/2021 – 12/17/2021
Spring Term 2022	01/10/2022 – 05/13/2022

- During the Fall Term the ETI enrolls 5 students using GI Bill® benefits (supported students) and 2 student completely self-paying who pay the full tuition and fees before the first day of class (non-supported students)
- The current 85/15 calculation for Example program is 71.43%



# Changes in Enrollment

## Changes In Enrollment Example – No Amendment Required

- VA-ONCE IHL ETI has one approved program (*Example program*) which has the following term dates:

Fall Term 2021	09/07/2021 - 12/17/2021
Spring Term 2022	01/10/2022 - 05/13/2022

- On 10/01/2021 one of the non-supported student drops from the program for personal reasons. On 11/01/2021 the other non-supported student drops from the program for personal reasons
- The ETI does not have to amend and resubmit new 85/15 calculations for the Fall term



# Changes in Enrollment

## Changes In Enrollment Example – No New Certifications

- VA-ONCE IHL ETI has one approved program (*Example program*) which has the following term dates:

Fall Term 2021	09/07/2021 - 12/17/2021
Spring Term 2022	01/10/2022 - 05/13/2022

- Prior to the Spring Term a new student wishes to enroll in the program and be certified for GI Bill® benefits (supported student). Because the program is already at over 85% supported students, this new student could not be certified for GI Bill® benefits





# Changes in Enrollment

## Changes In Enrollment Example – Program at 100%

- VA-ONCE IHL ETI has one approved program (*Example program*) which has the following term dates:

Fall Term 2021	09/07/2021 - 12/17/2021
Spring Term 2022	01/10/2022 - 05/13/2022

- During the Spring 2022 Term no new students enroll in the program. The current 85/15 calculation for Example program is 100%
  - All students continuously enrolled in the program may continue to be certified
  - 85/15 calculations must be provided to the ELR of jurisdiction because a program is in excess of 85% supported students
  - The ELR will suspend the program with an 85/15 payment suspension, which serves as a safeguard to prevent new students from being paid for the program



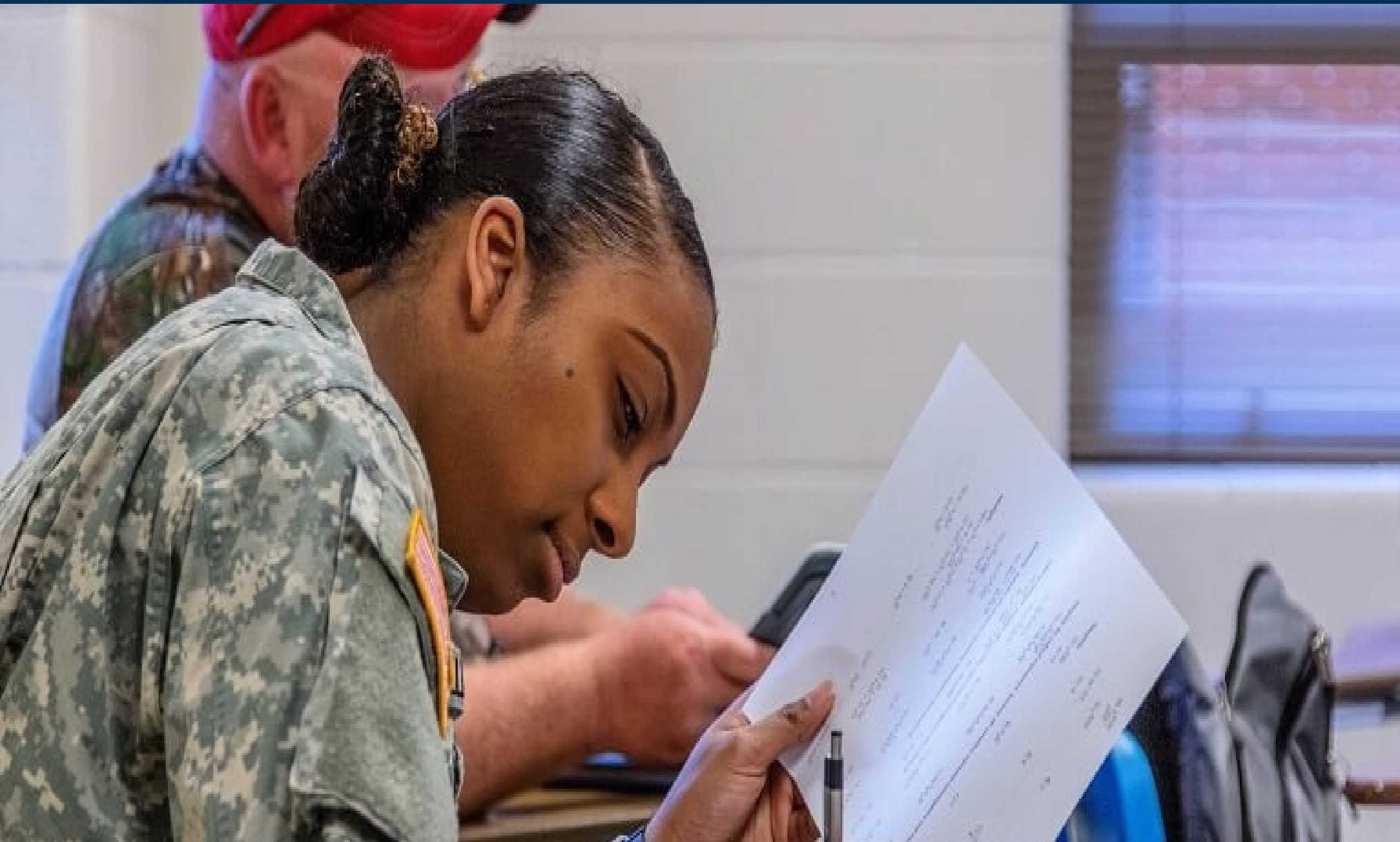
# Changes in Enrollment

## Changes In Enrollment Example – Natural Progression

- School Certifying Officials must ensure that they do not certify new students for terms which would cause the program to be in excess of 85% supported students (with the exception of Chapter 31 or Chapter 35 students)
- If a change in enrollment (or normal progression – such as graduation, academic dismissal, etc.) causes a program to exceed 85% supported students, VA will take payment suspension actions, but this would not be considered an error in certifying
- If a pattern of 85/15 violation is noted VA will take additional compliance actions and may escalate the pattern to other federal agencies for their review



# Knowledge Check



# Special Situations

## Special Situation – No Students In A Program

- When submitting 85/15 calculations, the ETI must list all approved programs (and any applicable tracks and concentrations) and provide calculations for those programs
- All programs must be included, even if there are no supported students or no students enrolled in the program at all
- This includes all approved undergraduate, graduate, and NCD programs



# Special Situations

## Special Situation – One Student In A Program

- When submitting 85/15 calculations, the ETI must list all approved programs (and any applicable tracks and concentrations) and provide calculations for that program.
- If a program has a total student population of one supported student, the ETI is not in violation of the 85/15 Rule. The ETI is not officially in violation of the 85/15 Rule until a second supported student enters the program.



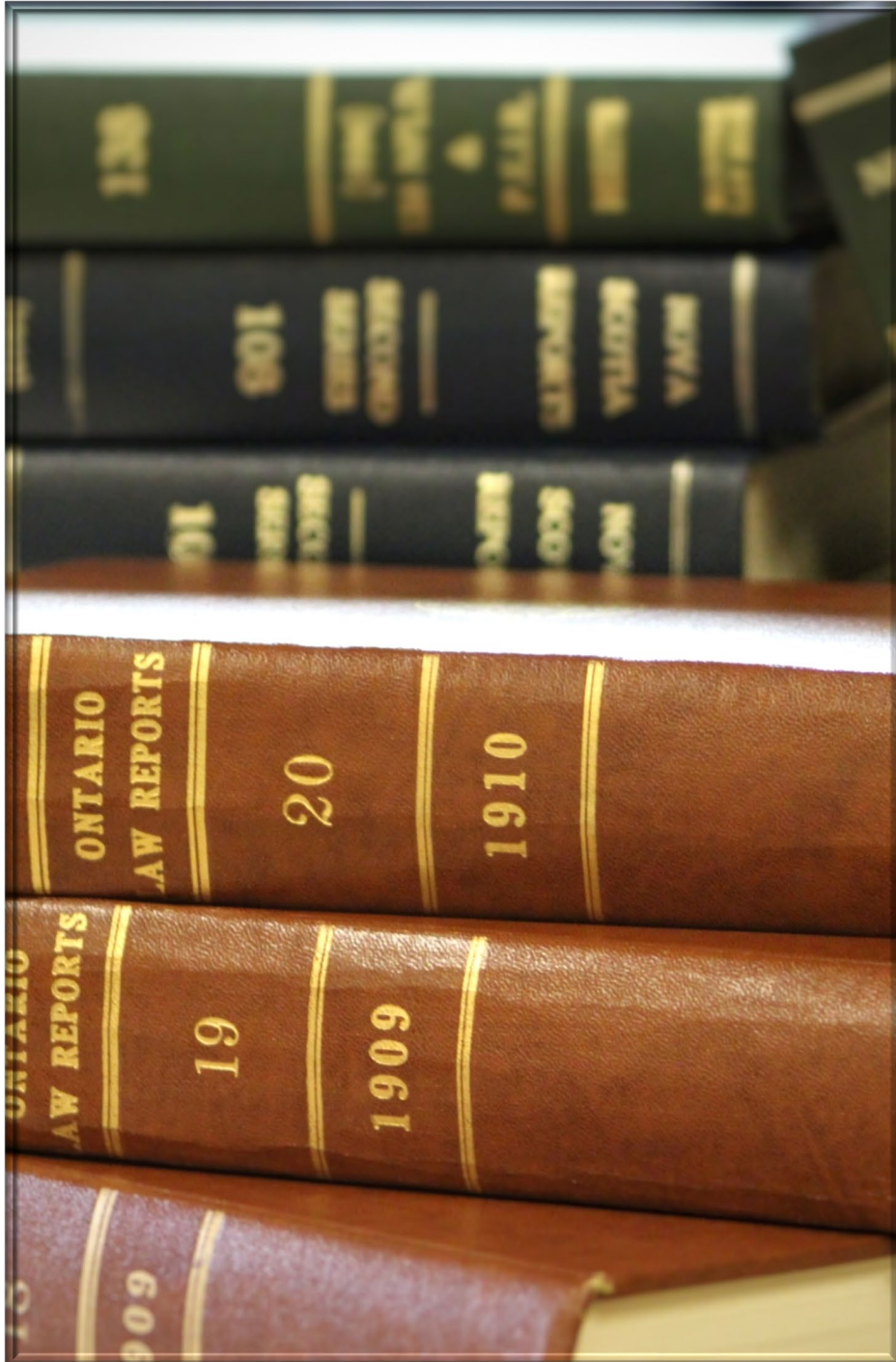
# 85/15 Rule Inquiries

Questions regarding specific 85/15 situations should be sent to your Education Liaison Representative of jurisdiction. Contact information for Education Liaison Representatives can be found on the [GI Bill® website](#).





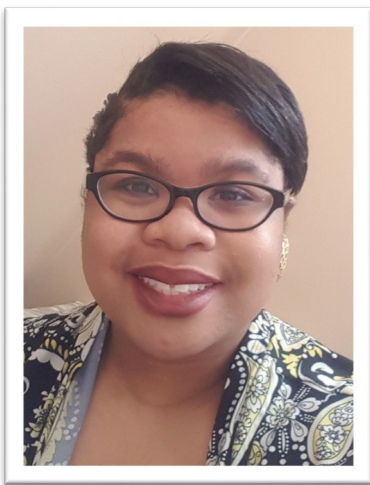
# Lesson References



- [38 U.S. Code § 3680A](#)
- [38 CFR § 21.4201](#)



# Ask VA



Victoria Evans  
Chief  
National Training Team - Schools



# Ask VA

## Account Creation



- The “Ask a Question” system on the GI Bill® website will be upgraded to a new system called “Ask VA” on October 18, 2021. You will then be able to submit questions and documents through the new system
- You will need a [VA.gov](https://www.va.gov) account. If you need to create a new account, you must [verify your identity](#). You can do so by using your account for certain secure VA systems, like [MyHealtheVet](#), or by creating an [ID.me](#) account.

**Note:** Creating an [ID.me](#) account may require personal identity documents.



## Account Creation...



- We advise you create your VA.gov account in advance, because it can take some time to verify your identity. Call the MyVA411 main information line at 800-698-2411 if you have issues setting up an account. Alternatively, you can use VA-ONCE to submit monthly certifications of an on-the-job training, apprenticeship, or work-study participant's hours, which is the preferred submission portal.



## International SCOs



**Note:** International SCOs should note that some [non-U.S. documents are accepted](#). If you have questions about the account verification process, these resources may help:

- [Privacy & security on VA.gov](#)
- [ID.me Help](#)



## Conversation History

- If you have an open issue in Ask a Question, it will be addressed and closed as part of the system transition.
- Any documents or evidence you've previously submitted will be preserved in your file, but any conversation history will be lost
- Make a record of any conversation history you want to preserve. To do this, open your "Ask A Question" account, open any inquiries you want to save, and copy the text of those inquiries into a stand-alone document.





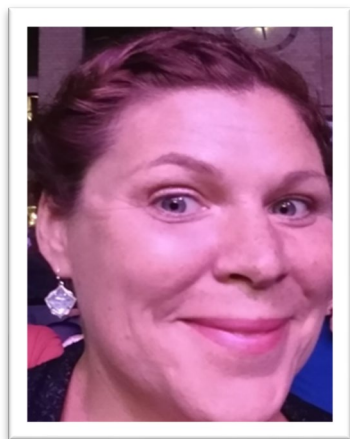
# Ask VA

## GI Bill® Frequently Asked Questions – **NEW!**

- As of **October 18, 2021**, any link to “Ask A Question” will automatically redirect to “Ask VA,” but we recommend that you update links and bookmarks to the new system
- All of the GI Bill® Frequently Asked Questions on the GI Bill® website will be moved to a new location. You will still be able to find them on the website, but if you’ve saved a link to a particular question, it will no longer work.



# SCO Annual Training Requirements



Marit Solem  
Training Specialist  
National Training Team- Schools

**Reminder: Today's Webinar must be Self Certified on October 1, 2021**



# FY22 SCO Annual Training Reminders

## New Training Cycle!

- The new training cycle runs from October 1 thru August 31 of the following year
  - Existing SCOs have 11 months to meet their annual training requirement
- September 1-30:
  - Training Window Closes for Existing SCOs
  - New SCO training is continuous throughout the year

## Training Compliance

- Compliance will be determined by the number of modules completed

## Centralized Certifications

- Only designated SCOs are required to complete the annual training ([22-8794 \(va.gov\)](https://www.va.gov/22-8794))
- SCOs listed as points of contact are not required to complete the training because they are not authorized to submit enrollment certifications to VA



# FY22 SCO Annual Training Reminders

## Training modality to complete annual training requirement:

- Asynchronous Online training located on the SCO training portal
  - Mandatory training topics specific to facility type
  - PowerPoint Presentations from virtual training events
- Synchronous SCO Approved training events (virtual or in-person instructor led) presented by or co-presented with a VA employee at:
  - Online Training Events
  - National or Regional Conferences
  - Local Workshops
  - One-On-One Training with the ELR of jurisdiction



# FY22 SCO Annual Training Requirements

## New SCOs

- Must complete the training prior to being authorized to certify enrollments to VA
- Upon training completion, must submit training certificates with VA Form 22-8794 to the ELR of jurisdiction

Facility Type	Number of Training Modules Required
Institutions of Higher Learning (IHLs)	10
Non-College Degree (NCD) Programs	10
High Schools and Residency Programs	1
OJT/Apprenticeship Programs	1
Vocational Flight	1



# FY22 SCO Annual Training Requirements

## Existing SCOs

- Must complete one (1) mandatory self-paced online training module specific to their facility type
- Must complete three (3) elective modules using the training modality of their choice

**Note: The three (3) electives are not required if only one (1) training module is needed to meet compliance**

Facility Type	Number of Training Modules Required
Institutions of Higher Learning (IHLs)	4
Institutions of Higher Learning (IHLs) with Flight Courses	4
Institutions of Higher Learning (IHLs) with NCDs	4
Non-College Degree (NCD) Programs	4
Vocational Flight	4
*High Schools and Residency Programs	1
*OJT/Apprenticeship Programs	1





# FY22 SCO Annual Training Requirements

Here are important training dates for School Certifying Officials (SCOs)



**Please remember, if you don't complete your annual training requirements, VA has the authority to remove your access from VA-ONCE and the SAA has the authority to disapprove your school's programs**



# FY22 SCO Annual Training Reminders

## Non-Compliance

- When covered institutions fail to complete the required training by the end of the training cycle, a notification via [Gov.Delivery](#) will be sent of the delinquency informing the institution of the impending loss of their ability to certify enrollments to VA
- If covered institution remains non-compliant after the end of the training cycle, the ELR will remove their ability to certify to VA and refer the institution to the SAA for review and determination on suspension or withdrawal actions in accordance with Colmery Act section 305
- It will be a function of the National Training Team – Schools to generate training compliance reports at the 90, 60, and 30-day milestones, and at the end of the training cycle to determine compliant and non-compliant institutions



# Communication Resources



[@GIBillEducation](#)



[@VAVetBenefits](#)



[VeteransBenefits@  
Messages.VA.gov](#)



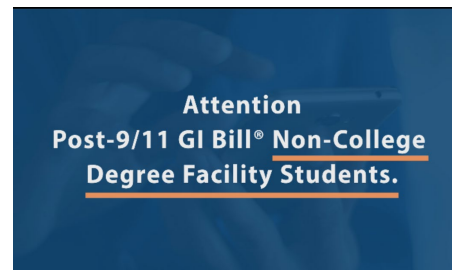
[NCD SCO Enrollment  
Verification Toolkit  
Available Now!](#)



[Enrollment  
Verification  
Webpage](#)



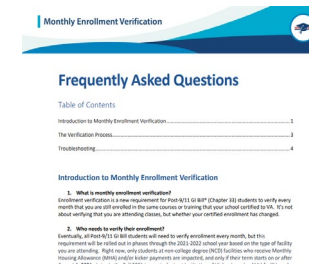
[How to Opt Into Text  
Message Verification Video](#)



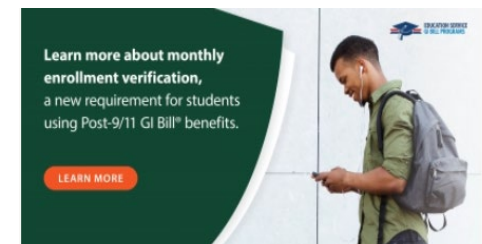
[How to Verify Your  
Monthly Enrollment Via  
Text Video](#)



[How to Verify  
Enrollment  
Infographic](#)



[Frequently Asked  
Questions](#)



[Enrollment Verification  
Vantage Point Blog](#)



# Resources

- [SCO Education and Training Page-](#)
- [SCO Training Portal](#)
- [School Certifying Officials Handbook](#)
- [ELR of Jurisdiction](#)





# How To Self Certify

**NOTE: THIS EVENT CAN NOT BE APPLIED TO FY21 TRAINING REQUIREMENTS!  
YOU MUST RETURN TO THE SCO PORTAL ON OCTOBER 1st (NEW FISCAL YEAR)  
TO SELF CERTIFY FOR FY22**

1. Click on the URL Below or **Copy** and **Paste** it in your web browser  
<https://vba-tpss.vbatraining.org/assess/trkSignIn?refid=XSCO>
2. Enter your email address and eight (8) digit facility code and click Next

**Note: If you do not have a User Profile, click New User Account and follow the steps to set up your profile**

3. Scroll down and click the Conference/Workshop/Virtual Training tab
4. Select the applicable training session from the list of topics that appears on the right side of the screen by clicking Begin
5. To enter Conference/Workshop/Virtual Training Title, click the dropdown arrow, select SCO Virtual Training Session and click Submit
6. Enter the start date and the end date
7. Enter your Facility Name, City and State (Main Campus) and click Submit
8. Certify your attendance by clicking Agree and then submit
9. Print your training certificate and keep for your records



# Email Inquiries & Contact Information

**Reminder:** Do **NOT** send any emails to the **Education Service Operations Integrity** Mailbox!

If you have questions or concerns regarding any of the following:

- Issues involving SCO Approved Credit & tracking your progress
- SCO Portal Access and its Use
- Inquiries on the [Adobe Connect](#) Registration & Access Process

You must **Only** submit them to the **Education Service Training** Mailbox  
[edutrainig.vbaco@va.gov](mailto:edutrainig.vbaco@va.gov)

**Spread The Word:** All Webinars and Training Events are announced via [GovDelivery](#)

You **must** register there and keep your information updated

Education Service **Does Not** maintain any Email Distribution Lists  
to inform Stakeholders of these important events!





**BIG  
THANKS  
FROM THE WHOLE  
TEAM**

**\* ATTENTION: ATTENTION \***

**This Event is Only approved for FY22**

**To receive credit, you must return to the SCO  
Portal on October 1, 2021 – the New Fiscal Year!**

**This Event Can Not be Applied toward  
FY21 Training Requirements!**

**We will send a GovDelivery Reminder but be  
Absolutely Sure you are Registered in GovDelivery!**