



Certification Process for NCD Schools



WAVES
July 2024

Overview

Non-College Degree (NCD) Programs typically include training in the trades industry, such as cosmetology, plumbing, electrical and automotive/truck repair. Throughout this presentation you will learn more about your responsibilities when it comes to certifying enrollments at your NCD facility.



Learning Objectives



Describe the methods for measuring courses at an NCD facility



Identify policies that must be followed when certifying benefits at an NCD facility



Explain the certification process for VA education benefits



Recall the documentation needed for record keeping requirements at NCD facilities.

Measurement of Courses





NCD Course Measurement

- Definitions of Hour Type
- Clock Hours
- Credit Hours
- Rate of Pursuit (RoP)
- Training Time



Clock Hours

SCOs must certify the actual number of clock hours per week the student is scheduled to attend

Certified hours will be compared with those listed on the enrollment agreement and class schedules

No averaging of clock hours is allowed

Definitions



Clock hours:

Actual hours per week a student spends attending class or other instructional activities that count toward completing a program of study.



Credit hours:

The number of credits a student receives for enrolling in, and successfully completing a given course.

Clock Hours

Classroom Theory Rules

- Rest breaks scheduled during class are excluded from net hours of instruction
- 10 minutes allowed to change classes or subjects each hour can be included in total hours of instruction

Shop/Practice Rules

- 15-minute morning and afternoon breaks can be included in total hours of instruction
- Shorter breaks are allowed for part-time enrollment

Lunch Break Rules

- All clock hours reported to VA must exclude any lunch or meal breaks
- 15-minute morning and afternoon breaks in predominately shop practice courses may not be combined for a half hour lunch

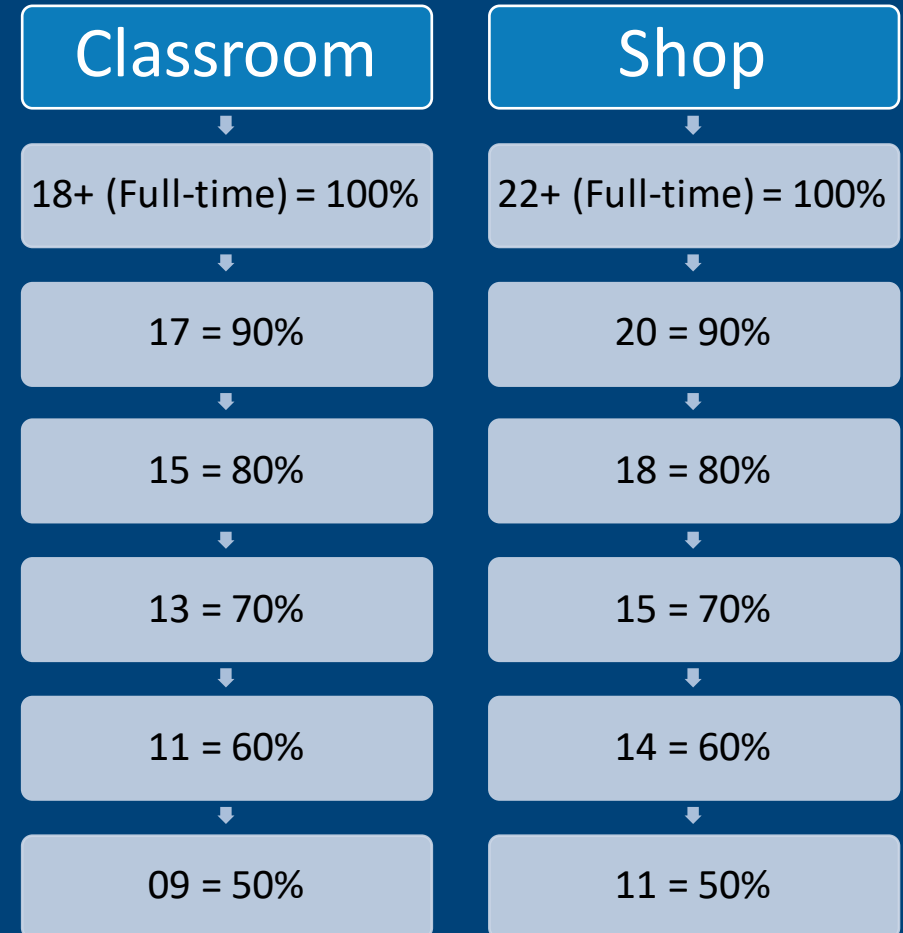
Rate of Pursuit (RoP) Clock Hour Measurement (Chapter 33)

Divide scheduled clock hours per week by full-time requirement

- 18 for Classroom Theory
- 22 for Shop Practice

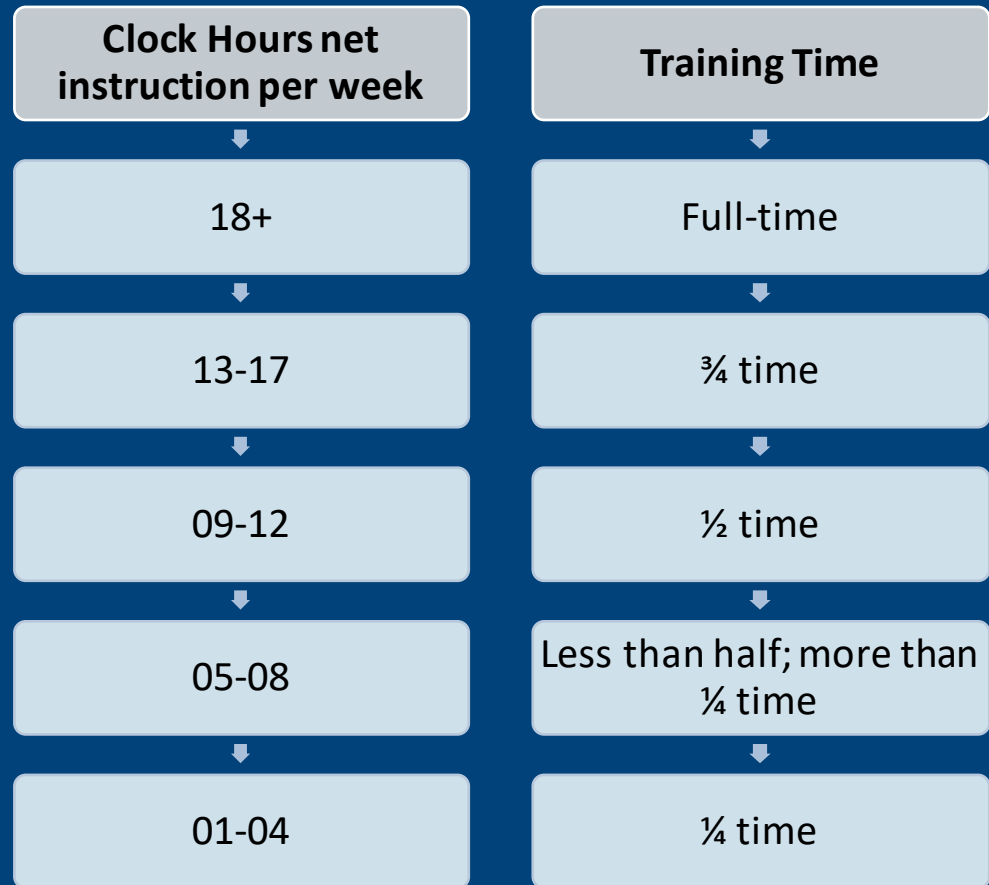
Anything at or above 18 CT or 22 SP will result in 100% ROP

For chapter 33 benefits, Monthly Housing Allowance is paid if rate of pursuit is greater than 50%.

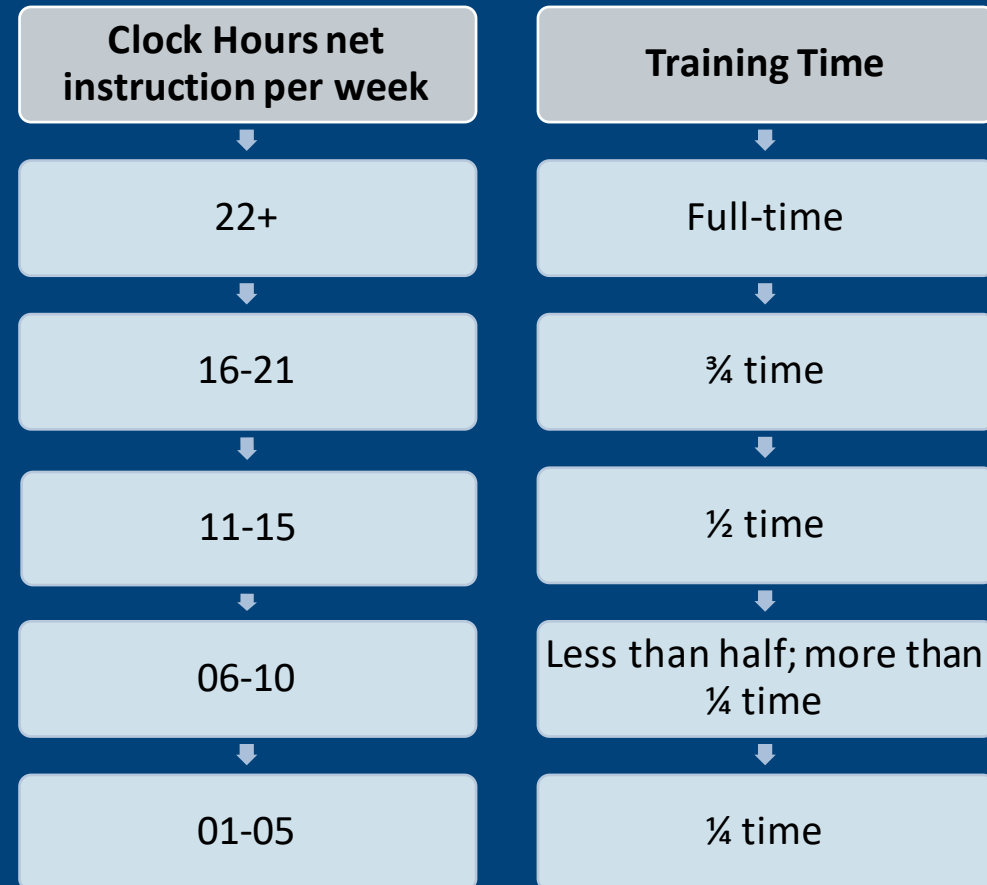


Training Time in Clock Hours (Non-33 Chapters)

Classroom Theory



Shop Practice



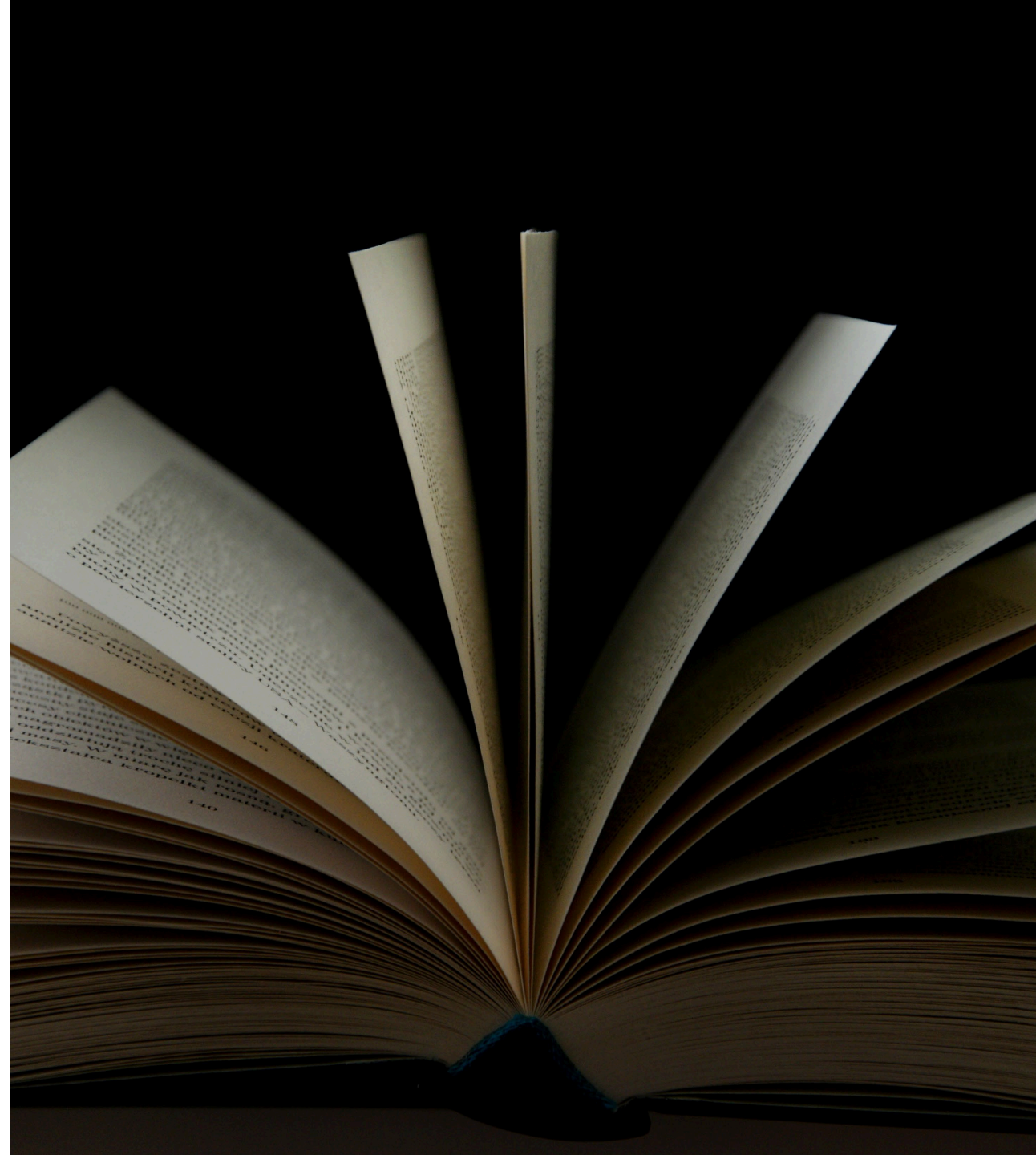
Policies





VA Guidelines and Certification Policies

- Standards of Progress (SoP)
- Attendance Standards
- Prior Credit
- Length of Courses
- Refund Policy
- Mandatory Fees
- VA as “Last Payer”
- 85/15
- Section 1018 of Public Law 116-315
- Contracted Courses



Standards of Progress (SoP)



A school's policy and regulations must define:

1

The school's attendance policy

2

The school's grading system

3

The minimum satisfactory grade level

4

Description of any probationary period

5

Conditions for interruption of training

6

Conditions for dismissal due to unsatisfactory conduct

7

Conditions for re-entrance or readmission

To be eligible for VA benefits, schools are required by law to maintain and enforce standards of progress and conduct.

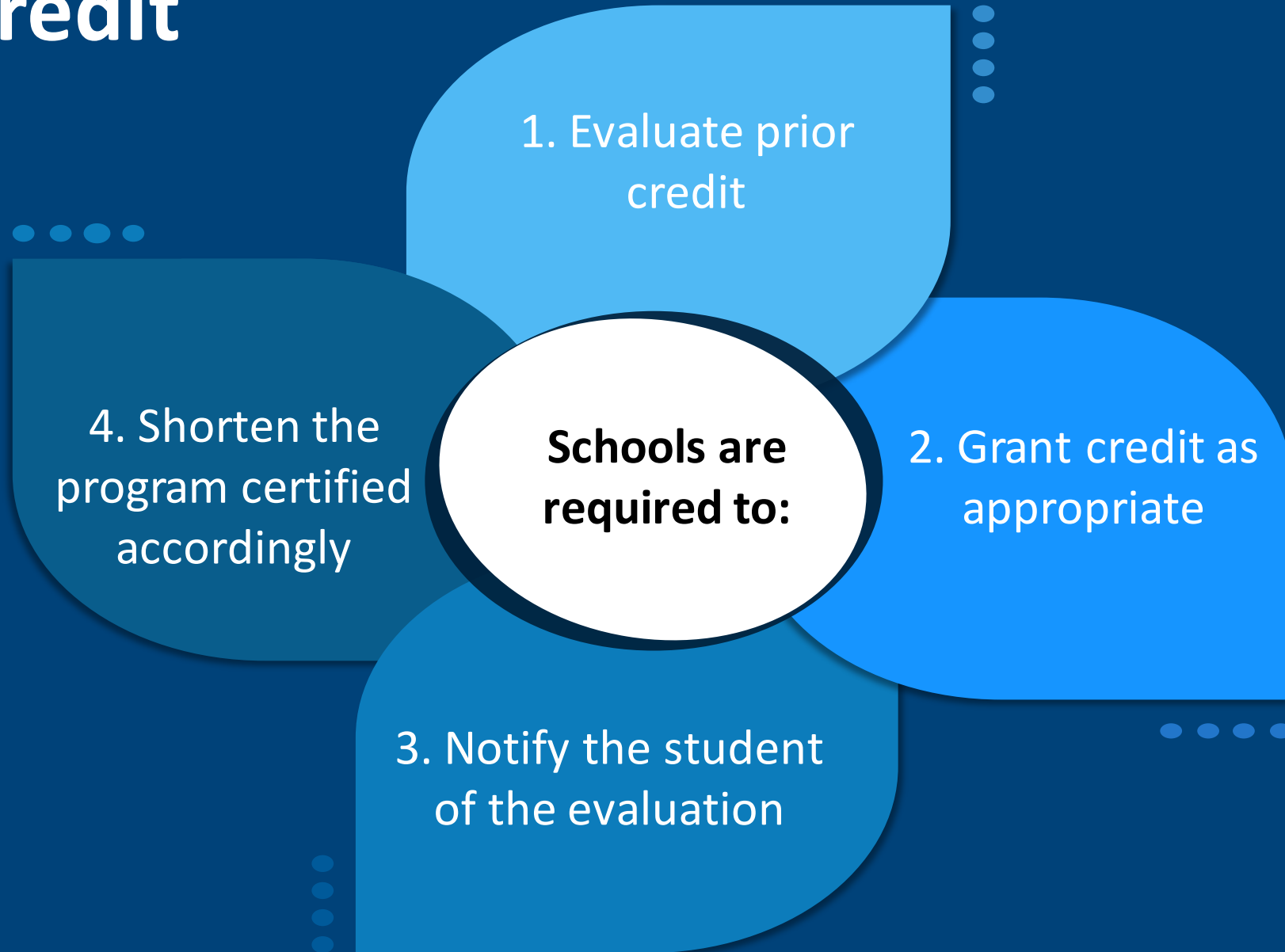


Attendance Standards

- Schools offering nonaccredited programs are required by federal law to have attendance standards.
- These standards must be stated plainly in the school's catalog or bulletin.
- Facilities with attendance standards as part of their Standards of Progress must enforce those standards for GI Bill beneficiaries.
- If a program is measured in clock hours, benefits are paid based on the scheduled clock hours of attendance per week.



Prior Credit



Length of Courses

Schools cannot certify a program for more hours than the SAA has approved

Improper program length certification can result in denial of payment



Refund Policy- Nonaccredited Programs



38 CFR 21.4254 (c)(13):
Facilities may request approval for nonaccredited programs but must meet the minimum pro rata requirements of 38 CFR 21.4255, for those programs.

38 CFR 21.4255:
A refund policy meets these requirements, if it provides that tuition, fees, and other charges for a portion of the course do not exceed the approximate pro rata portion of the total charges for tuition, fees, and other charges for the length of the completed portion pertaining to the total length of the course.

Mandatory Fees

Mandatory means the charge is assessed to all students without exception. If there is an exception, the charge is not considered mandatory and is not reimbursable for any GI Bill beneficiary.



Mandatory fee Example:

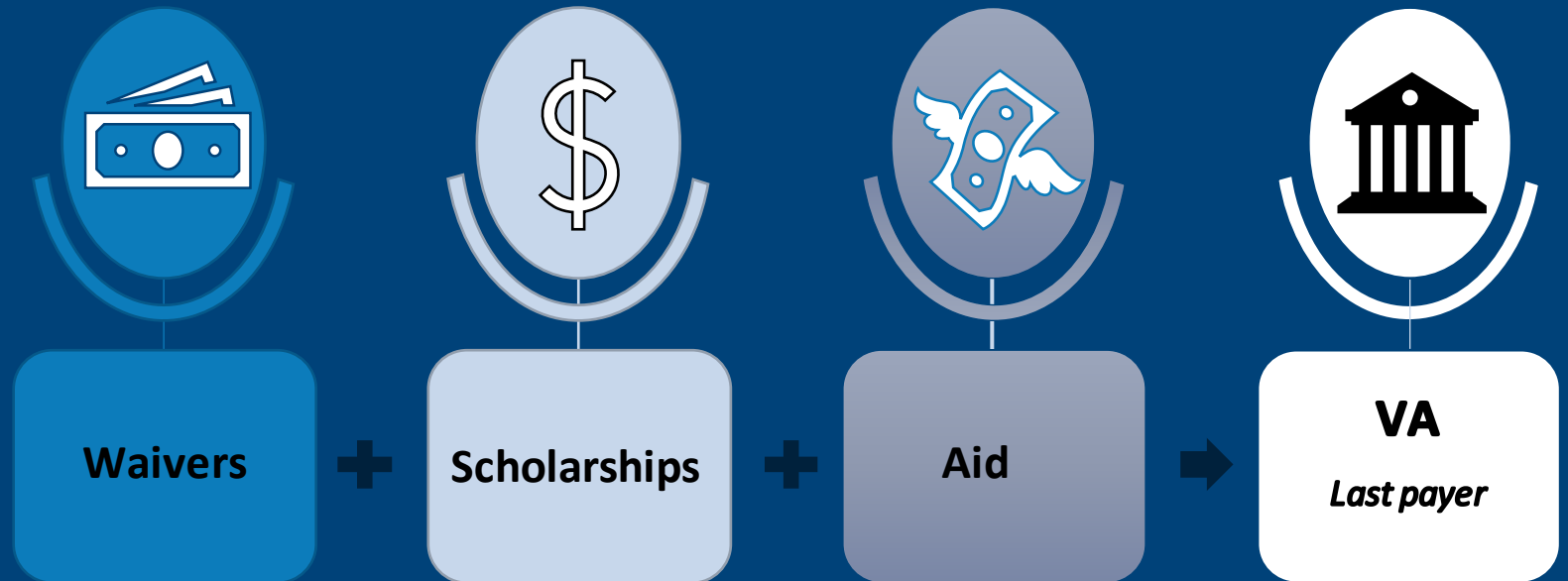
A parking fee is assessed to all students regardless if they drive to the facility or not.

Non-Mandatory fee Example :

A parking fee is assessed to only students with cars.

VA as “Last Payer”

Before assessing charges to VA, facilities must apply tuition only specific:



85/15

The 85/15 rule (85/15) requires that a minimal number of self-funded students find a program worthwhile and valuable or the payment of Federal funds to Veterans who enroll in the program will not be authorized.

VA cannot award benefits to any newly enrolling beneficiary if the ratio of GI Bill and institutionally funded students exceeds 85 percent

Students maintaining continuous enrollment may continue to receive benefits for that program

Students receiving benefits under chapters 31 or 35 may enroll in programs that exceed 85 percent support students

For additional information on the 85/15 rule, please visit our website. We recommend you begin with a visit to the 85/15 frequently asked questions webpage https://benefits.va.gov/gibill/85_15_faqs.asp.

Section 1018 of Public Law 116-315

Section 1018 codifies in statute:

1

Schools must provide a covered individual with a personalized shopping sheet, maintain certain policies, provide graduation information, seek appropriate accreditation approval, and designate a point of contact.

2

The State Approving Agency must act when a school violates specific provisions of the law.

Contracted Courses

Must be

specifically approved

by the SAA

Example of a Contracted Course:

CDL program where the school does not own the trucking company, instructors, or equipment

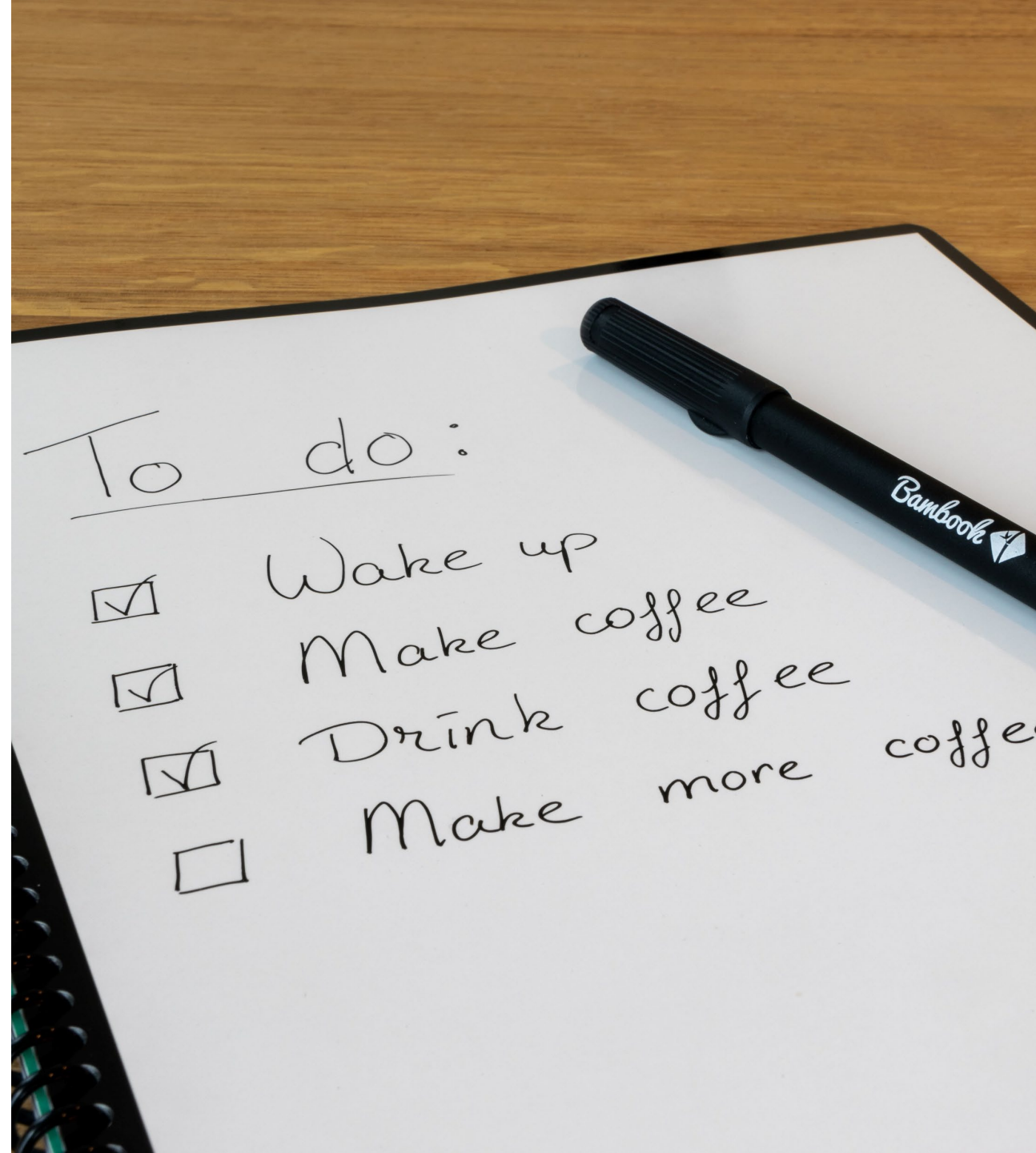
How to Certify





NCD Certification Process

- VA Form 22-8794
- Timeliness
- Tuition for Non-33 Chapters
- Tuition and Fees for Chapter 33
- Weekly Clock Hour Variance
- Public Law 116-315, Section 1010



VA Form 22-8794

- Each facility will designate at least one VA School Certifying Official (SCO) to carry out reporting requirements.
- It is **required** that a new VA Form 22-8794 be submitted anytime an SCO is added or removed.

The image shows a computer monitor displaying the VA Form 22-8794, 'Designation of Certifying Official(s)'. The form is a multi-section document with instructions and a table for listing certifying officials. The instructions section includes:

- INSTRUCTIONS**
- 1. This form must be completed whenever there is a change in any of the information, including the names listed, contained on this form.
- 2. This form must be completed for all VA facilities, including those that are not VA facilities.
- 3. This form must be completed for all VA facilities, including those that are not VA facilities.
- 4. This form must be completed for all VA facilities, including those that are not VA facilities.
- 5. This form must be completed for all VA facilities, including those that are not VA facilities.

The form also includes a table for listing certifying officials with columns for Name, Title, and Organization. The table is currently empty.

*Locate most recent version on Resources for Schools Webpage

Timeliness

Chapters 30, 32,
35, and 1606:
Can be submitted
120 days before
the term begins

Chapter 33:
Submit
certifications as
early as possible

Must be
submitted no later
than 30 days after
the start of the
term or
enrollment period.

Tuition for Non-33 Chapters



Tuition and Fees must be reported for enrollment periods when:



Training time is less than ½ time



The student is on active duty



Accelerated payment is requested



Tuition and Fees for Chapter 33



Tuition is the actual established charges the student is required to pay for tuition.



Fees are mandatory charges applied by the school for pursuit of an approved program of education.



Report the net Tuition and Fees charged to the student after deducting any amounts paid with Federal Funds.



Net Charges for Tuition and Fees (Chapter 33)

Certify the **actual** amount of tuition charged (at the in-state rate) **less** any scholarships, discounts, or other payments paid directly to or by the school and **designated solely for tuition and fees**

- Do **not** include any Title IV payments
- Do **not** include third-party payments intended to cover the cost of tuition **and** other educational costs



Tuition-Specific Scholarships and Aid (Chapter 33)

Examples of tuition-only specific scholarships or aid may include, but are not limited to:

- Employer payments to schools specifically for tuition and fees
- Private scholarships paid directly to school for tuition and fees
- ROTC scholarship (where payments specified for tuition and fees)
- Military Spouse Career Advancement Accounts (MyCAA)
- Heath Professional Scholarship Programs (HPSP)
- Military tuition assistance



Examples of Non-specific Scholarships or Aid that you **May Not** Deduct (Chapter 33)

- Employer payments to schools when not specified for tuition and fees **only**
- Private scholarships paid directly to school when not specified only for tuition and fees
- ROTC scholarship (where payments are specified for other than tuition and fees)
- Some state programs (prepaid tuition programs, state 529 plans)

These examples are not all inclusive but do provide an idea of what is deducted from costs.

KEY

Payments are not designated solely for tuition and fees, but can also be used for other specific or general school related expenses

Tuition Waiver by the School (Chapter 33)

Any portion of tuition and fees waived by the school cannot be reported to VA in the net charges.

For example, 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 \$5,000. 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 deduct the amount the school waived to ensure the enrollment to VA reflects total charges of \$2,500 for tuition and fees. VA would then pay \$1,250.

VA will only pay 50% of the net charges certified as the student's benefit level is 50%.

Certifying Tuition and Fees (Chapter 33)

Title IV

In no instance is an award of federal financial aid under Title IV deducted from net charges for tuition and fees. These include, but are not limited to:

- Unsubsidized and Subsidized Federal Family Education Loans (FFEL)
- Unsubsidized and Subsidized Federal Direct Stafford Loans
- Federal Perkins Loans
- FFEL Parent (PLUS) Loans, Federal Direct PLUS Loans
- Federal Pell Grants
- Federal Supplemental Educational Opportunity Grant

Validity of Fees (Chapter 33)

Before a fee can be certified to VA, it must meet ALL 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 students, **without exception**.

If unsure, please call the School Certifying Officials Hotline or submit an inquiry using [Ask VA](#).

Validity of Fees (Chapter 33)

Examples (not all-inclusive) of:

Fees that can be included

- Student services fees
- Technology fees
- Lab fees
- *Mandatory* graduation fees
- Health insurance premiums (if not waived)

Fees that **cannot** be included

- Application fees (a.k.a., preadmission fees)
- Books*
- Fees for transportation, food, lodging
- Penalty fees, e.g., late registration, late course changes, fees for makeup hours

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

Prorating Tuition

Tuition and fees must be spread across enrollment periods to allow for VA to calculate the correct amount of a payment/overpayment should there be a change in the enrollment.

When to Prorate: Programs scheduled to operate across several terms, enrollment periods, or modules.

Tuition and fees certified for each term

If, as is the practice of some schools, all tuition and fees are billed up-front, then tuition and fees must be prorated (or spread across) each enrollment period. The section on entitlement charge identifies the reasons for doing this.

Prorating Tuition

If a school charges all tuition up-front

Tuition certified to VA should be *prorated across enrollment periods*

Important because **entitlement** is charged based on tuition and fees charged.

- If one enrollment period lists all tuition and fees for an entire program up-front, entitlement charged based on tuition and fees certified
- If subsequent enrollment periods are certified with \$0.00 in tuition and fees, entitlement will be charged based on the rate of pursuit (results in VA student's entitlement getting hit twice)

Certifying Tuition and Fees with Proration

Tuition certified to VA should be **prorated across enrollment periods.**

Desktop IT Specialist is approved for 150 clock hours.

Tuition and fees is \$750

Program	Begin	End	Res	Dist.	R/D	Clock	T & F
Desktop IT Specialist	08/05/24	08/16/24	0.0	0.0	0.0	25.0	\$250
Desktop IT Specialist	08/19/24	08/30/24	0.0	0.0	0.0	25.0	\$250
Desktop IT Specialist	09/09/24	09/20/24	0.0	0.0	0.0	25.0	\$250

Each enrollment period above represents one of the three two-week long modules required to successfully complete the Desktop IT Specialist program.

Certifying Tuition and Fees

If a school does not charge all tuition up-front

Tuition certified to VA should be submitted in the same *increments* as which it is billed to the students

- **Important** because if the school bills in increments, certifies all charges to VA up front, then the student drops, VA will create a large debt for tuition and fees that have not actually yet been charged.
- **Important** because it impacts entitlement charge.

Program	Begin	End	Res	Dist.	R/D	Clock	T & F
Esthetician	08/26/24	12/05/23	0.0	0.0	0.0	30.0	\$1600
Esthetician	01/13/25	04/28/25	0.0	0.0	0.0	30.0	\$1450

This is a 900-hr program offered at a public vocational technical school with non-standard terms and open enrollment. Each enrollment period above represents one of the two 450-hour billing cycles across which this program is offered.

Scheduled Weekly Clock Hour Variance



Reporting a Scheduled Weekly Clock Hour Variance

Benefits are paid based on the scheduled number of clock hours per week. The amendment effective date, ending date, and number of clock hours a student is scheduled to attend each week must be reported.

If clock hours per week vary, the variance must be reported for calendar weeks, Sunday through Saturday.

- Do not report changes caused by published school closures or holidays.
- Do not submit amendments for absences that are allowed within the school's approved attendance policy. Certifying Officials must monitor VA students' attendance, and for poor attendance, enforce the attendance policy for failure to meet attendance standards.
- Do not extend enrollment for students who need additional hours simply because of absences. If a student failed a portion of the course and must repeat it, that portion may be re-certified if the student continues to meet the Standards of Progress.

Note: The standard accepted legal U.S. definition of a calendar week is Sunday through Saturday and is the definition used for reporting clock hour variances. This rule is different when determining the start date for courses in a program that operates on a term basis (change in rule).

Example 1 of Variance of Hours

Student is attending a Cosmetology school.

- Student is scheduled to take 25 clock hours per week.
- Full-time for the program is 22 clock hours per week.
- Attendance policy is that the student cannot miss 4 consecutive days of class.
 - 1) Week One: Student attends class regularly for 25 clock hours.
 - 2) Week Two: Student is ill, missing part of a day and a full day of class. Attends 15 clock hours.
 - 3) Week Three: Student attends class regularly for 25 clock hours.
 - 4) Week Four: Student attends class regularly for 25 clock hours.

Variance does not need to be reported.

Example 2 of Variance of Hours

Student is attending an Emergency Medical Technician program.

- ❑ Student is scheduled to attend part-time at 20 clock hours per week.
- ❑ Full-time for the program is 22 clock hours per week.
- ❑ For one week per month this student participates in field training and their schedule increases from 20 clock hours per week to 25 clock hours for that week.

- 1) Week One: Student attends class regularly for 20 clock hours.
- 2) Week Two: Student attends class regularly for 20 clock hours.
- 3) Week Three: Student participates in field training for 25 clock hours.
- 4) Week Four: Student attends class regularly for 20 clock hours.

Variance does need to be reported.

Reporting a Scheduled Weekly Clock Hour Variance

Example:

Shop-based program begins 09/11/23 and ends 10/06/23 at 20 clock hours per week.

Net tuition and fees cost of program is \$600.

- Eff 09/18/23 scheduled weekly clock hours change to 27 clock hours per week.
- Eff 10/01/23 scheduled weekly clock hours change to 15 clock hours per week.

Action	Begin <u>or</u> Effective	End	Resident	Distance	Remedial/ Deficiency	Clock	T & F
Enrollment	09/11/23	10/06/23	0.0	0.0	0.0	20.0	\$600
Amendment	09/18/23	-----	0.0	0.0	0.0	27.0	\$600
Amendment	10/01/23	-----	0.0	0.0	0.0	15.0	\$600

Reporting a Scheduled Weekly Clock Hour Variance

Shop-based program begins 09/11/23 and ends 10/06/23 at 20 clock hours per week.

Enrollment information

Training facility (*Required)
25039611 - EMPIRE BEAUTY SCHOOL-ATLANTA - COSMETOLOG

Enrollment name ⓘ

Begin date (*Required)
09/11/2023

End date (*Required)
10/06/2023

Credits and tuition

Resident credits (*Required)

Online credits (*Required)

Clock hours

If the student's hours include approved Online Clock Hours, please apply this VBA Remark below:
"Clock Hours for this student are approved to be taken online". If this remark is not applied, the student may incur a debt.

Tuition & Fees amount (*Required)

Enrollments | Student Info | Programs | Benefits | Notes | History

Filter

Add multiple enrollments | Add enrollment

[09/11/2023 - 10/06/2023 at EMPIRE BEAUTY SCHOOL-ATLANTA](#) Amend

Facility code: 25039611 | September 11, 2023 - October 06, 2023

ENROLLMENT - SUBMITTED | Total clock hours 20

[09/11/2023 - 10/06/2023 at EMPIRE BEAUTY SCHOOL-ATLANTA](#) Amend

Facility code: 25039611 | September 11, 2023 - October 06, 2023

ENROLLMENT - SUBMITTED | Total clock hours 20

Tuition and fees \$600.00

Enrollment history

Type	Effective date	Submitted date	Status	
Enrollment	-	8/28/2023	SUBMITTED	View details

Reporting a Scheduled Weekly Clock Hour Variance

The Enrollment Certification (VA Form 22-1999) submitted via Enrollment Manager reflects the initial certification for the student's enrollment in a Cosmetology program from 09/11/23 - 10/06/23.

The student is enrolled for 20 clock hours per week and tuition and fees cost certified to VA is \$600.00.

Student Information

Adams, [REDACTED]

Type of Training

NCD

Program Name

COSMETOLOGY

Credit for Prior Training

NONE

Begin Date	End Date	Res Hrs	Online Hrs	Clock Hrs	T&F Amt	YR Amt	Out St Amt
09/11/23	10/06/23	0	0	20.0	600.00	0	0

Vacation Periods

Remarks

Date Signed:

08/28/2023

School Information

MICHAEL [REDACTED]
EMPIRE BEAUTY SCHOOL-ATLANTA
2190 HENDERSON MILL RD
ATLANTA, GA 30345
vets.dgib.user+274@gmail.com
SCO Phone Number
Facility Code 25039611

Electronically Received by VA: 08/28/2023

VA Form 22-1999

OMB Control No. 2900-0073

Respondent Burden: 10 minutes

Expiration Date: 08/31/2024



Reporting a Scheduled Weekly Clock Hour Variance

Shop-based program begins 09/11/23 and ends 10/06/23 at 20 clock hours per week.

1st Amendment - Eff 09/18/23 scheduled weekly clock hours change to 27 clock hours per week

Enrollment information

Training facility (*Required)
25039611 - EMPIRE BEAUTY SCHOOL-ATLANTA - COSMETOLOG

Enrollment name

Begin date (*Required)
09/11/2023

End date (*Required)
10/06/2023

Credits and tuition

Graduation/End of Term or Course
 Termination

Resident credits (*Required)
0

Online credits (*Required)
0

Clock hours
27

If the student's hours include approved Online Clock Hours, please apply this VBA Remark below:
"Clock Hours for this student are approved to be taken online". If this remark is not applied, the student may incur a debt.

Tuition & Fees amount (*Required)
600

Vacation periods

What counts as a vacation period? ~

+ Vacation period

Amendment information

Amendment Reason (*Required)
Increase

Amendment effective date (*Required)
09/18/2023

Remarks

VBA remarks
Select

+ Add Custom Remark

Notes (optional)

You can write a note to record additional information about the enrollment that you want to share with other School Certifying Officials at your school.

Notes are stored in the student's profile. **They are not submitted with the enrollment.**

Submitted Amendment

09/11/2023 - 10/06/2023 at EMPIRE BEAUTY SCHOOL-ATLANTA Amend

Facility code: 25039611 | September 11, 2023 - October 06, 2023

AMENDMENT - SUBMITTED | Total clock hours 27

Tuition and fees \$600.00

Enrollment history

Type	Effective date	Submitted date	Status	
Amendment	9/18/2023	8/28/2023	SUBMITTED	View details
Enrollment	-	8/28/2023	VA_REVIEW	View details



Reporting a Scheduled Weekly Clock Hour Variance

Enrollment Manager reflects the amendment to decrease the number of clock hours last certified. This Notice of Change in Student Status (VA Form 22-1999b) reflects the change is effective on 10/01/23.

The student is now scheduled to take 15 clock hours per week and tuition and fees cost certified to VA remains \$600.00.

Notice of Change in Student Status - Form 22-1999b - Enrollment Manager ver. DGI-4.0 - CH33

VA File No. [REDACTED]

Student Information

Adams, [REDACTED]

Type of Training

NCD

Program Name

COSMETOLOGY

Amendment Reason

Increase

Amendment Effective Date

2023-09-18

Mitigating Circumstances

Begin Date	End Date	Res	Hrs	Online Hrs	Clock Hrs	T&F Amt
09/11/23	10/06/23	0		0	27.0	600.00

Vacation Periods

Remarks

Date Signed:

08/28/2023

School Information

MICHAEL [REDACTED]
EMPIRE BEAUTY SCHOOL-ATLANTA
2190 HENDERSON MILL RD
ATLANTA, GA 30345
vets.dgib.user+274@gmail.com
SCO Phone Number
Facility Code 25039611

Electronically Received by VA: 08/28/2023

VA Form 22-1999b

OMB Control No. 2900-0073

Respondent Burden: 10 minutes

Expiration Date: 08/31/2024



Reporting a Scheduled Weekly Clock Hour Variance

Shop-based program begins 09/11/23 and ends 10/06/23 certified at 20 clock hours per week.

2nd Amendment - Eff 10/01/23 scheduled weekly clock hours change to 15 clock hours per week.

Enrollment information

Training facility (*Required)
 25039611 - EMPIRE BEAUTY SCHOOL-ATLANTA - COSMETOLOG

Enrollment name ⓘ

Begin date (*Required)
 09/11/2023

End date (*Required)
 10/06/2023

Credits and tuition

Graduation/End of Term or Course
 Termination

Resident credits (*Required)
 0

Online credits (*Required)
 0

Clock hours
 15

If the student's hours include approved Online Clock Hours, please apply this VBA Remark below:
"Clock Hours for this student are approved to be taken online". If this remark is not applied, the student may incur a debt.

Tuition & Fees amount (*Required)
 600

Vacation periods

What counts as a vacation period? v

+ Vacation period

Amendment information

Amendment Reason (*Required)
 Reduction (Non-College)

Amendment effective date (*Required)
 10/01/2023

Revised End Date (*Required)
 10/06/2023

Remarks ⓘ

VBA remarks
 Select

+ Add Custom Remark

Notes (optional)

Second Submitted Amendment

09/11/2023 - 10/06/2023 at EMPIRE BEAUTY SCHOOL-ATLANTA Amend

Facility code: 25039611 | September 11, 2023 - October 06, 2023

AMENDMENT - UNDER REVIEW | Total clock hours 15

Tuition and fees \$600.00

Enrollment history

Type	Effective date	Submitted date	Status	
Amendment	10/01/2023	8/28/2023	VA_REVIEW	View details
Amendment	9/18/2023	8/28/2023	VA_REVIEW	View details
Enrollment	-	8/28/2023	VA_REVIEW	View details



Reporting a Scheduled Weekly Clock Hour Variance

Enrollment Manager reflects the amendment to decrease the number of clock hours last certified. This Notice of Change in Student Status (VA Form 22-1999b) reflects the change is effective on 10/01/23.

The student is now scheduled to take 15 clock hours per week and tuition and fees cost certified to VA remains \$600.00.

Student Information

Adams, [REDACTED]

Type of Training

NCD

Program Name

COSMETOLOGY

Amendment Reason	Amendment Effective Date	Mitigating Circumstances
Reduction (Non-College)	2023-10-01	

Begin Date	End Date	Res Hrs	Online Hrs	Clock HrsT&F Amt
09/11/23	10/06/23	0	0	15.0 600.00

Vacation Periods

Remarks

Date Signed:

08/28/2023

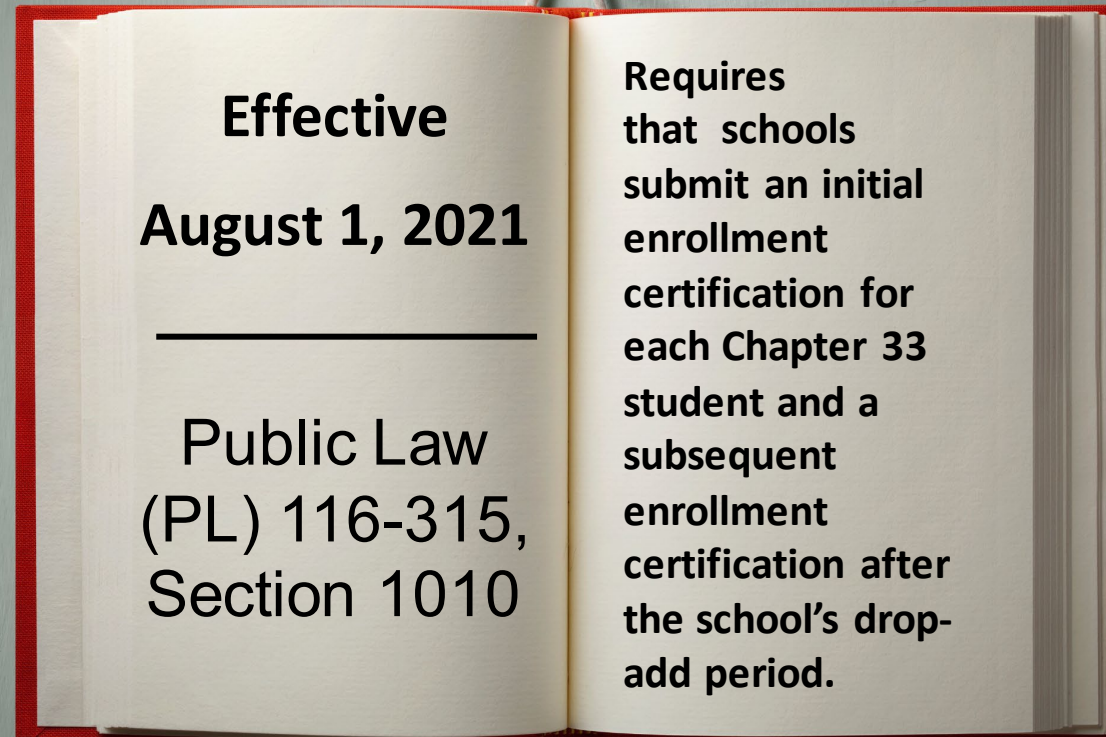
School Information

MICHAEL [REDACTED]
EMPIRE BEAUTY SCHOOL-ATLANTA
2190 HENDERSON MILL RD
ATLANTA, GA 30345
vets.dgib.user+274@gmail.com
SCO Phone Number
Facility Code 25039611

Electronically Received by VA: 08/28/2023

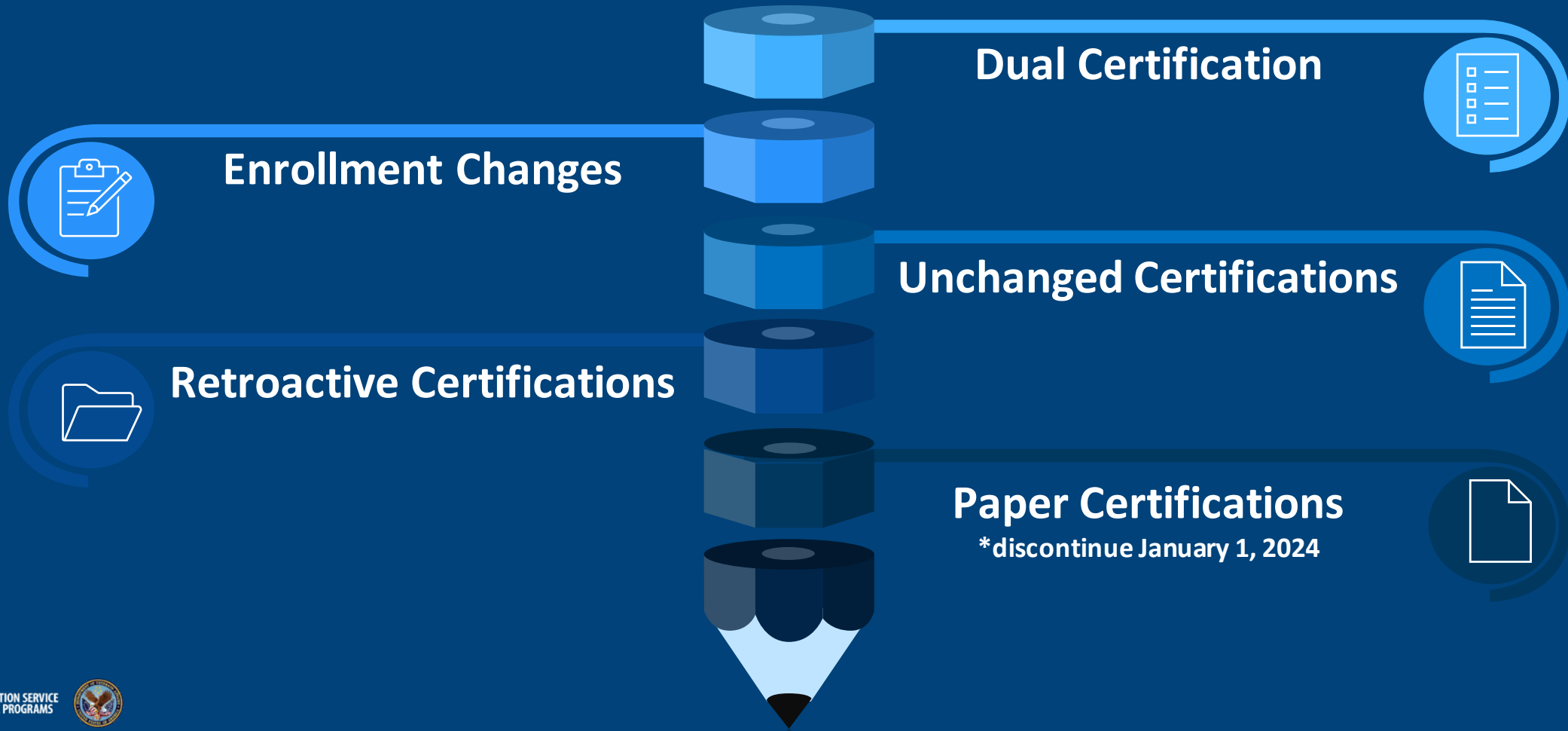


Public Law 116-315, Section 1010

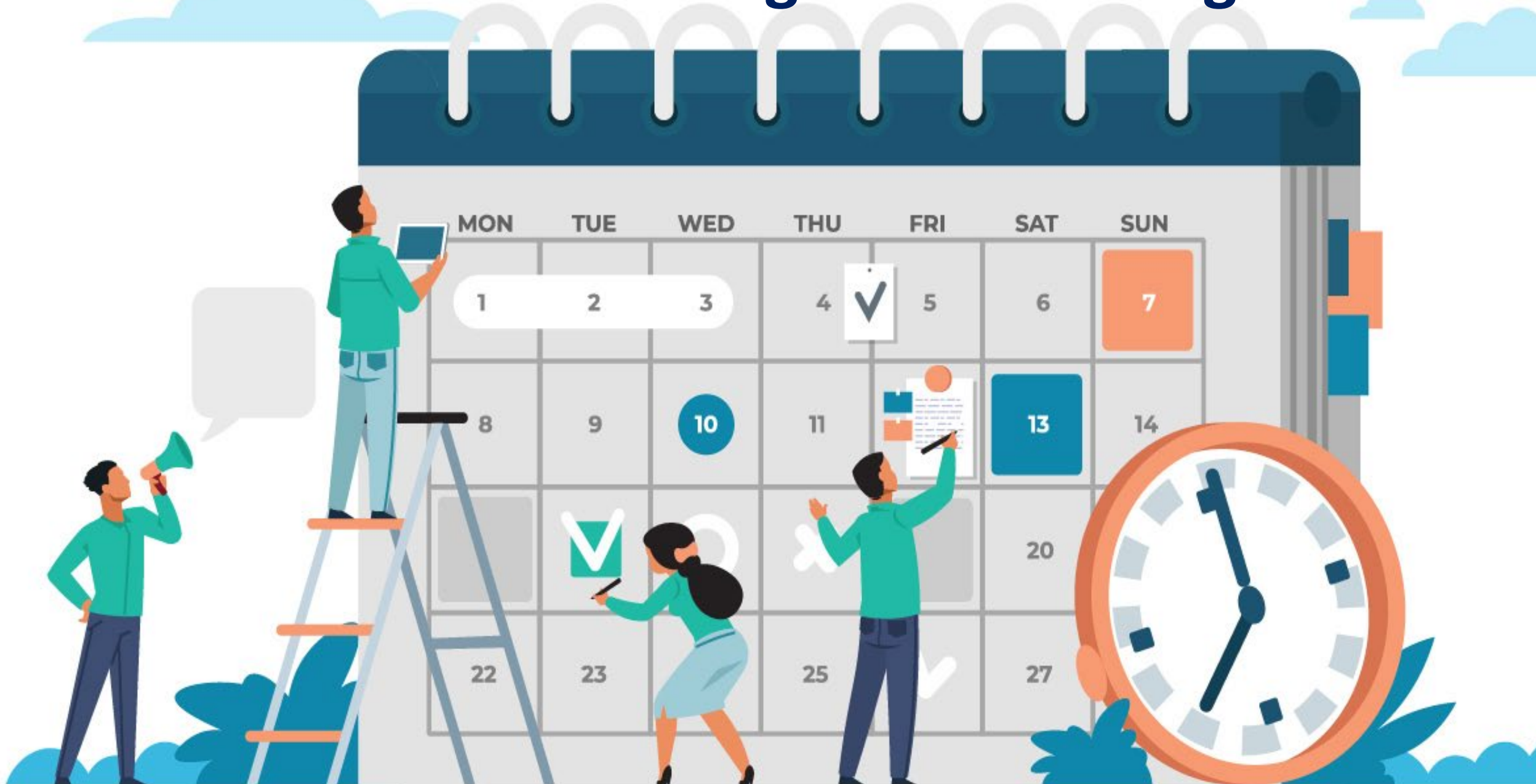


Public Law 116-315, Section 1010

A second certification must be submitted using:



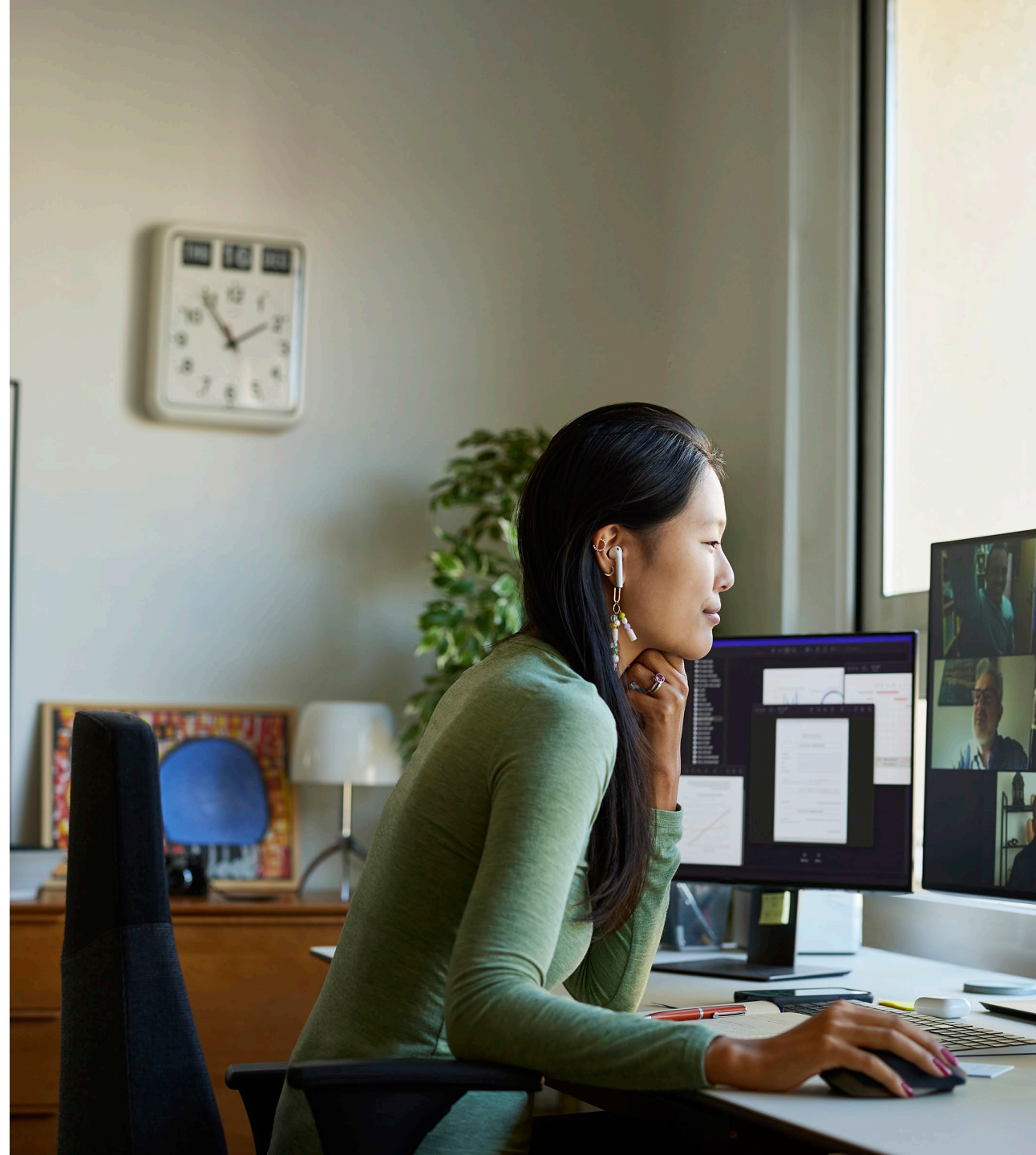
Entitlement Charge for NCD Programs





Entitlement Charge

- ❑ What is entitlement?
- ❑ How is entitlement charged for NCD programs?



What is Entitlement?

Entitlement is the months of VA education benefits a person has earned.

Picture a roll of tickets where..

- ❑ Each roll of tickets equals a month of benefit.
- ❑ The coupons in the roll combine to equal 30 days of benefits.

Some tickets have an expiration date (called the delimiting date), and some don't.



Entitlement Charges Under Chapters 30, 1606, or 35

Entitlement is charged 1 day for every day of full-time training.

- When training at full-time for one month, the student is charged one month of entitlement.
- When training at one-half time for one month, the student is charged at 15 days of entitlement.

Formula: Multiply training time x the number of days in the term (all months are counted as 30 days regardless of actual number of days in the month) equal amount of entitlement charged (in days).

Example:

Enrollment Period	08/15/23 to 09/14/23	30 days
Training time	Student is attending at $\frac{3}{4}$ time	75% of fulltime
Calculation	30 days x 75% (or .75)	22 days

This student is charged 22 days of entitlement for this enrollment period.



How Entitlement is Charged for Programs Offered at Standalone NCD Schools

Chapter 33 entitlement is based on the amount of tuition and fees paid out of the student's annual cap for a specific program.

- ❑ A one-month long program that costs **\$27,120.05** (the 23-24 annual cap) will cost the student one year of entitlement regardless of the length of the program.
- ❑ Conversely, an 18-month program that costs **\$2,260** will cost the student only one month of entitlement but pay full housing and books and materials for the entire period.



Entitlement Charge Under Chapter 33

If Tuition and Fees are paid:

The daily rate is computed as:

- ❑ The certifiable tuition and fees divided by the yearly cap – this is the daily rate
- ❑ Daily Rate multiplied by 360
- ❑ The result is the amount of entitlement charged (in days)

Example:

A program that costs **\$10,000.00** will cost this student 4 months and 12 days of entitlement regardless of the length of the program.

Certifiable Tuition and Fees Divided by Yearly Cap	$\$10,000.00 \div \$27,120.05$	0.36873
Daily Rate × 360	0.36873×360	132 days Entitlement Charged

Entitlement Charge Under Chapter 33

If only Housing is paid – no Tuition and Fees are paid:

Entitlement is charged according to rate of pursuit:

- ❑ For example, if the student is training at full-time (100% rate of pursuit) for one month, they will be charged one month of entitlement.
- ❑ For example, if the student is training at half time (50% rate of pursuit) for one month, they will be charged at 15 days of entitlement. *MHA is only paid at more than 50% rate of pursuit.

Example:

Enrollment Period	08/12/24 to 10/11/24	60 days
Rate of Pursuit	Enrolled 15 clock hours per week 18 clock hours is full time	80% of full time
Calculation	60 days x 80% (or .8)	48 days of entitlement

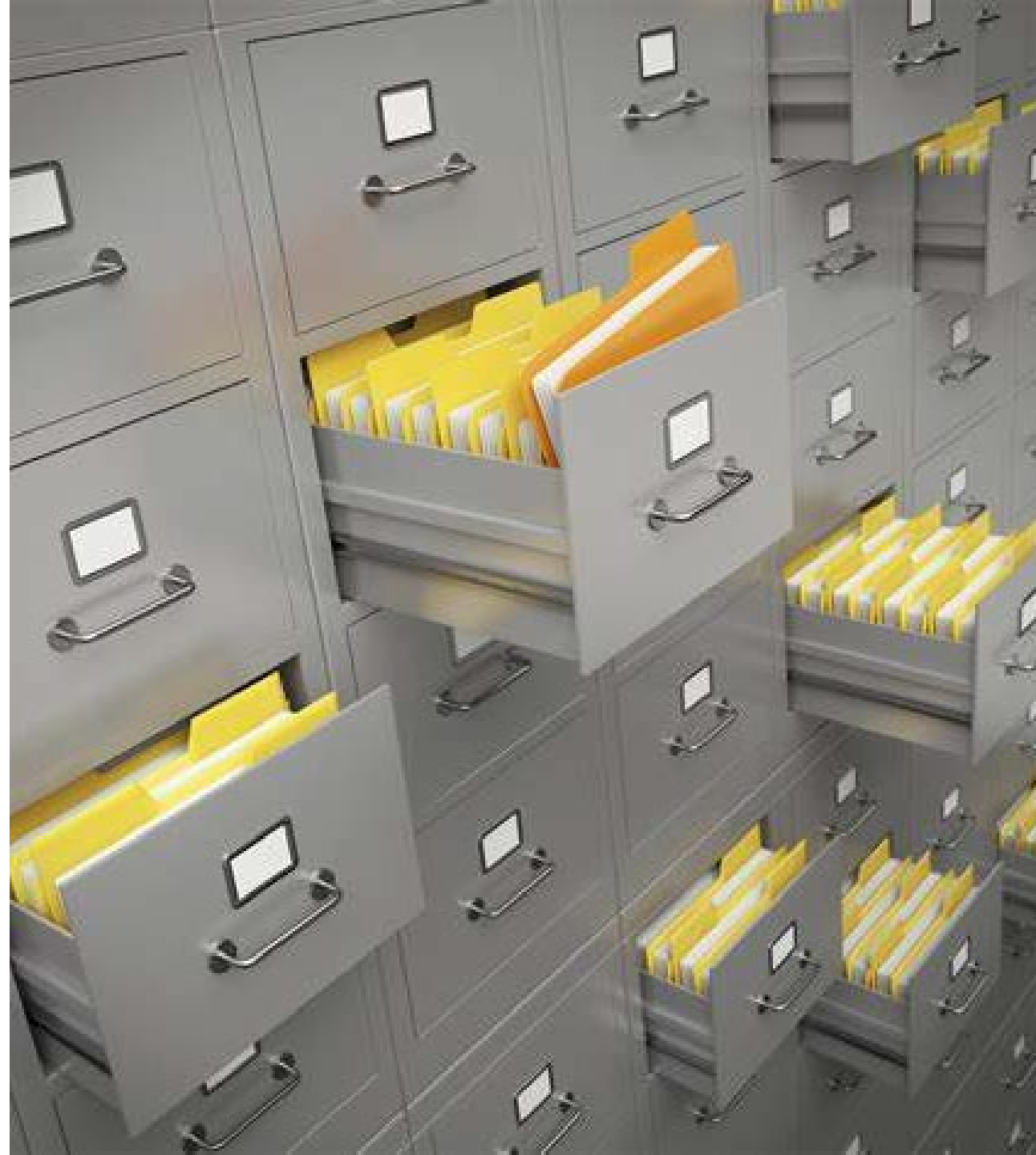
A stack of papers or documents, slightly blurred, against a dark background. The papers are stacked vertically, with the top one being the most prominent. The lighting is soft, highlighting the edges of the pages.

Record Keeping Requirements



Documentation of Records

- Compliance Surveys
- Retention of VA Records
- School Records
- Financial Records
- Reporting Fees
- Best Practices



Compliance Surveys

Compliance Surveys ensure schools, training establishments, and approved courses are in compliance with all applicable provisions of the laws administered by VA.

Compliance Activities Include:

01

The review of
approval
information



02

Liaison with schools,
training establishments,
and SAAs



Retention of VA Records

VA student records must be kept for

3
Years

following the end date of the last period certified

School Records



Applications



Transcripts



**Grade
Reports**



Enrollments

Will be reviewed during a compliance visit

Financial Records



School financial records will be reviewed to verify:

Tuition and fees paid by the VA to schools (chapter 33) and by VA students (all other GI Bill® programs) are accurate and not more than those paid by non-VA students.

Reporting Fees

Reporting fees paid to a school for 100 or more eligible students, cannot be used for, or merged with, the school's general fund.



Best Practices



- ✓ Documents should be clearly labeled and arranged in files according to the VA beneficiary.
- ✓ School should have a policy to reflect monitoring of academic progress and attendance.
- ✓ School should stay up to date on VA training requirements.
- ✓ Adequate staffing to support the VA education programs.
- ✓ Report accurate information to VA timely.



ASSESSMENT

Knowledge Check



Knowledge Check

Which of the following do you deduct when certifying net tuition and fees?

- a. Title IV aid
- b. Prepaid College funds
- c. Tuition-only scholarship
- d. Scholarship designated to be used to offset the cost of tuition and fees





Knowledge Check

What is the correct way to certify clock hours for an NCD program?

- a. Certify the actual number of clock hours per week on the student is scheduled to attend.
- b. Certify the average number of clock hours per week.
- c. Certify the average number of clock hours per month
- d. All of the above depending on the program.





Knowledge Check

Tuition certified to VA should be prorated across enrollment periods.

- a. True
- b. False





Knowledge Check

Which of the following school records will NOT be reviewed when a compliance survey is conducted?

- a. Transcripts
- b. Applications
- c. Approval application
- d. Enrollments
- e. Grade reports



Summary



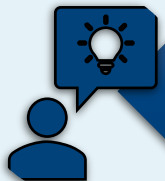
Describe the methods for measuring courses at an NCD facility



Identify policies that must be followed when certifying benefits at an NCD facility



Explain the certification process for VA education benefits



Recall the documentation needed for record keeping requirements at NCD facilities.



Resources

[VA Education And Training Benefits | Veterans Affairs](#)

[School Certifying Official Handbook \(On-line\) \(va.gov\)](#)

[Resources for Schools Webpage](#)

[SCO Resource Matrix](#)

Questions?



Thank You!



Please take brief survey:



[WAVES July 2024 Conference Survey – Certification Process for NCD Schools](#)

