



**Education Service  
School Certifying Official Training  
Non-College Degree Programs**



# Learning Objectives

**Upon completion of this module, you should be able to:**

- Describe the methods for measuring courses at an NCD facility
- Identify policies that must be followed for certifying benefits at an NCD facility
- Describe the Certification Processes for VA Education Benefits
- Identify the documentation needed for record keeping requirements at NCD facilities.





## Measurement of Courses



## Measurement of Courses

### Per 38 CFR 21.4270

Training at NCD facilities can be measured in two ways:

- Credit Hours, or
- Clock Hours

NCD schools operating on a non-standard term basis measure courses in clock hours.

NCD schools operating on a standard term basis (semester or quarter) can measure in clock hours or credit hours.



# Clock Hours: Definition

## Clock Hours

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

- Complete 18 clock hours per week if the predominant portion is spent in the classroom
- Complete 22 clock hours per week if the predominant instruction is more like shop practice





## Clock Hours: Measurement

### Classroom Theory

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 (Must be deducted from total hours of instruction if no class or subject change)

### Shop Practice

15-minute morning and afternoon breaks can be included in total hours of instruction

Shorter breaks are allowed for part-time enrollment

### Lunch or Meal Breaks

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





# Clock Hours: Measurement

## Certifying Classroom Theory vs. Shop Practice

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	$\frac{3}{4}$ -time	16 – 21	$\frac{3}{4}$ -time
09 – 12	$\frac{1}{2}$ -time	11 – 15	$\frac{1}{2}$ -time
05 – 08	Less than half; more than $\frac{1}{4}$ -time	06 – 10	Less than half; more than $\frac{1}{4}$ -time
01 – 04	$\frac{1}{4}$ -time	01 – 05	$\frac{1}{4}$ -time

# Credit Hours

0000 XXXXXXXXXXXX \* STATE, STATE 0000-0000

**NAME HERE UNIVERSITY**

YOUR NAME  
00000 YOUR ADDRESS  
STATE, XX 0000

Social Security Number  
[REDACTED]

MALE 00/00/00 PRINTED 01/30/06 PAGE 1

ENGLISH PROFICIENCY PASSED MAJOR : YOUR SUBJECT  
MAJOR : YOUR SUBJECT

Course Number	Description Title	Grade	Cr. Hr.	Sec. Hr.	Sec. Cr.	Sec. Pr.	Course Number	Description Title	Grade	Cr. Hr.	Sec. Hr.	Sec. Cr.	Sec. Pr.
ADMISSION RECORD							FALL 1996						
HIGH SCHOOL GRADUATE							BIOL 3444 GENETICS A 4 16						
KEMPNER H. S.							BIOL 3444 GENETICS LAB 0 0						
GRADUATION DATE 05/27/95							CHEM 3315 ORGANIC CHEMISTRY A 3 12						
FALL 1995							ART 3343 ART APPRECIATION A 3 12						
BIOL 2473 GEN BIO I CELLMOLE B 4 12							CURRENT SEMESTER 4.00 10 10 40						
BIOL 2473L BIO I CELLMOLE LAB 0 0							CUMULATIVE 3.90 42 48 164						
CONV 0000 CONVOCATION P 0 0 0							FALL 1996						
PSYC 1313 GENERAL PSYCHOLOGY A 3 12							HIST 2313 THE UNITED STATES E CR 3 0						
CHEM 2413 CHEMICAL CONCEPTS A 4 16							HIST 2323 THE UNITED STATES E CR 3 0						
CHEM 2413 CHEM CONCEPTS LAB 0 0							MATH 2434 CALCULUS I E CR 4 0						
CURRENT SEMESTER 3.64 11 11 40							SPAN 1314 BEGIN SPAN PROF E CR 3 0						
CUMULATIVE 3.64 11 11 40							SPAN 1324 BEGIN SPAN PROF E CR 3 0						
FALL 1996							SPAN 2314 CONT SPAN PROF E CR 3 0						
ENGL 1313 LANG & COMP E CR 3 0							SPAN 2324 CONT SPAN PROF E CR 3 0						
ENGL 1323 COMP & LITERATURE E CR 3 0							CURRENT SEMESTER 0.00 0 22 0						
CURRENT SEMESTER 0.00 0 6 0							CUMULATIVE 3.90 42 70 164						
CUMULATIVE 3.64 11 17 40							WINTER 1996						
WINTER 1995							CHEM 3333 ORGANIC CHEMISTRY A 3 12						
CHEM 2414 CHEMICAL PRINCIPLES A 4 16							CHEM 3121 ORGANIC CHEM LAB B 1 3						
CHEM 2414L CHEMICAL PRINCIPLES LAB 0 0							PHYS 2413 PRIN OF PHYSICS I B 4 12						
CISM 1321 INTRO TO COMP SYS A 3 12							PHYS 2413 PRINPHYSICS I LAB 0 0						
BIOL 2474 GEN BIO II BOTIECOL A 4 16							CURRENT SEMESTER 3.38 8 8 27						
BIOL 2474L GEN BIO II LAB 0 0							CUMULATIVE 3.82 50 78 191						
CONV 0000 CONVOCATION P 0 0 0							SPRING 1997						
CURRENT SEMESTER 4.00 11 11 44							CHEM 4373 BIOCHEMISTRY A 3 12						
CUMULATIVE 3.82 22 28 84							PHYS 2423 PRIN OF PHYSICS II B 4 12						
SPRING 1996							PHYS 2423 PRINPHYSICS II LAB 0 0						
SPCH 1313 COMMUNICATIONS PROC A 3 12							CHRI 1313 OLD TESTAMENT A 3 12						
BIOL 2475 GEN BIO III ANIMALS A 4 16							CURRENT SEMESTER 3.60 10 10 36						
BIOL 2475 GEN BIO III LAB 0 0							CUMULATIVE 3.78 60 88 227						
SOC 1313 PRIN OF SOCIOLOGY A 3 12							FALL 1997						
CONV 0000 CONVOCATION P 0 0 0							BIOL 4454 IMMUNOLOGY A 4 16						
CURRENT SEMESTER 4.00 10 10 40							BIOL 4454 IMMUNOLOGY LAB 0 0						
CUMULATIVE 3.88 32 38 124							CHEM 4414 INTRO PHYS CHEM A 4 16						
SPRING 1997							CHEM 4414 INTRO PHYS CHEM LAB 0 0						
SPCH 1313 COMMUNICATIONS PROC A 3 12							YR 2299 OF CEPTMAN WILL A 2 8						
BIOL 2475 GEN BIO III LAB 0 0							CL REN DE IS 4.00 1 40						
SOC 1313 PRIN OF SOCIOLOGY A 3 12							CL REN DE IS 3.81 1 267						
CONV 0000 CONVOCATION P 0 0 0							UNIVERSITY REGISTRAR						
CURRENT SEMESTER 4.00 10 10 40													
CUMULATIVE 3.88 32 38 124													

ISSUED TO STUDENT

UNIVERSITY REGISTRAR

THE NAME OF THE UNIVERSITY APPEARS IN WHITE TYPE ACROSS THE FACE OF THIS 8 1/2 X 11 TRANSCRIPT

NCD programs offered on a standard semester or quarter basis in credit hours:

- Are certified the same as degree program
- Consist of individual unit subjects pursued consecutively
- Are certified based on the school's published calendar term dates





## Section Review

Training at NCD facilities can be measured in credit hours or clock hours.

- True
- False



## Section Review

Training at NCD facilities can be measured in credit hours or clock hours.

- True
- False



# Policies



## Policies: Attendance Policy Non-Accredited



Non-Accredited NCD facilities must have an attendance policy that addresses:

- Leave
- Absences
- Class cuts
- Makeup work
- Tardiness
- Interruption for unsatisfactory attendance



## Policies: Attendance Policy Accredited



**If the accredited school has a standard of attendance**

- It must maintain the records to show the student meets the school's standard of attendance.



## Policies: Attendance Policy

If a program is measured in clock hours, benefits are paid based on clock hours certified per week.

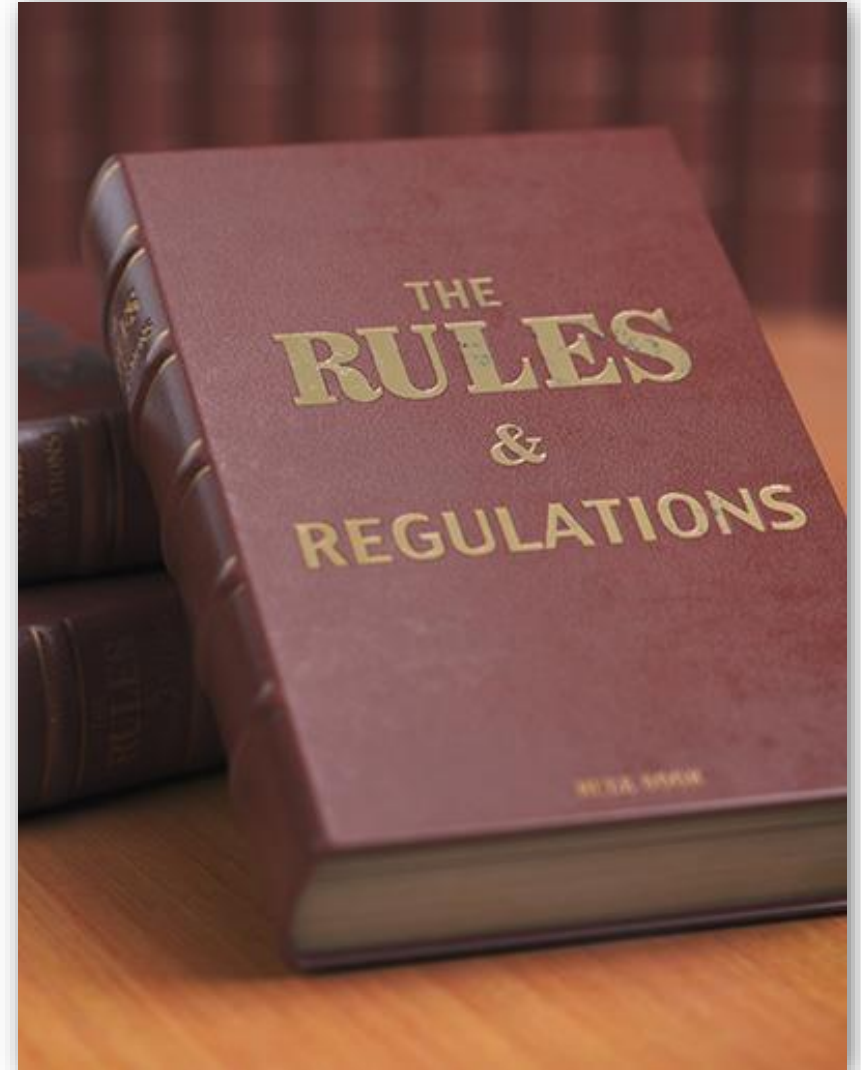
You **may not** extend the certified end date for students due to absences.





## Policies: Standards of Progress (1 of 3)

- Both accredited and non-accredited schools must have and enforce approved Standards of Progress (SOP) and conduct
- Only **non-accredited schools** are required by federal law to have attendance standards





## Policies: Standards of Progress

SOP, conduct and attendance guidelines must be in the school's catalog or bulletin and define:

- The grading system
- The minimum satisfactory grade level
- Conditions for unsatisfactory grades or progress
- A description of any probationary period
- Conditions for re-entrance after dismissal for unsatisfactory progress
- Conditions for dismissal due to unsatisfactory conduct
- The attendance policy







## Policies: Standards of Progress

### Academic Probation

- Could result in academic suspension if the student fails to adhere to progress standards.

### Academic Suspension

- The termination date assigned by the school will be the last day of the term or other evaluation period in which the student's progress became unsatisfactory.





# Policies: Credit for Prior Training & Credit Evaluation

## Credit for Prior Training

- Transfer courses
- Credits
- Previous experience

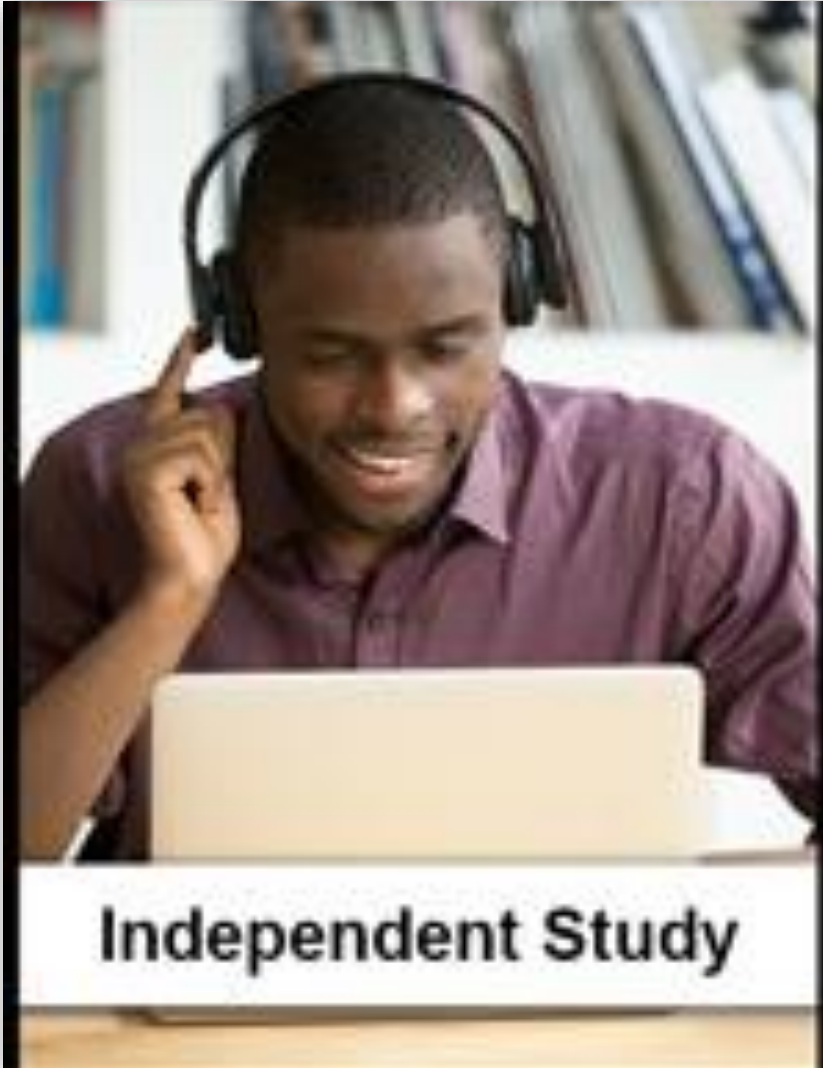
## Credit Evaluation

- Completed when students enroll or change programs
- Reviewed by VA during compliance surveys





## Independent Study



Independent Study and Hybrid/Blended courses that do not meet resident training requirements must be certified as distance learning.

### *NCD Facilities*

**Cannot** certify a student if any part of the program is independent study.

### *Improper Certifications*

Can result in suspension (or withdrawal) of your sites approval to receive GI Bill benefits and school or student debts.



## Policies: 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 and may be escalated from the Regional Processing Office to the ELR, and possibly SAA for formal review. Program length certification will be reviewed during Compliance Surveys.

### *The Exception:*

Students repeating a distinct module that was formally failed, but only if the module is scheduled to be repeated during normal, scheduled classroom hours.

If the module is repeated as makeup hours during non-class time, it cannot be certified to VA for payment



## Policies: Refund Policy



### **Non-Accredited Facilities**

- Must meet the Pro Rata requirements of 38 CFR 21.4255

### **Accredited Facilities**

- Satisfy your accrediting agency and meet approval requirements set by your SAA

### **All Facilities**

- Correct and prompt
- Mandatory



## Section Review

One of the criteria for approval of any school for Veterans' training is that it reviews prior credit and grants credit as appropriate to a VA student's current program.

- True
- False



## Section Review

One of the criteria for approval of any school for Veterans' training is that it reviews prior credit and grants credit as appropriate to a VA student's current program.

- True
- False



## Section Review

Non-accredited schools are required to have which standards in their catalog?

- A. The school's grading system.
- B. Conditions for interruption of training due to unsatisfactory grades or progress.
- C. A description of any probationary period.
- D. Conditions for dismissal due to unsatisfactory conduct.
- E. All of the above.





## Section Review

Non-accredited schools are required to have which standards in their catalog?

- A. The school's grading system.
- B. Conditions for interruption of training due to unsatisfactory grades or progress.
- C. A description of any probationary period.
- D. Conditions for dismissal due to unsatisfactory conduct.
- E. **All of the above.**



## Policies: Mandatory Charges

If there's **one** exception, the charge isn't mandatory and therefore not reimbursable.

*Example of a mandatory fee:*

- A parking fee assessed to all students
- A specific cosmetology kit purchased in full, from your facility without exception

*Example of a non-mandatory fee:*

- Parking fee assessed to only students with cars
- A cosmetology kit purchased in components from 3rd party and given credit for those components



## Policies: VA as the Last Payer

Last Payer – Facility applies tuition-only specific waivers, scholarships, aid, and assistance before charging the VA.

Some state specific funds are exempt from this obligation.

Title IV funds do not impact the amount of tuition and fees certified to VA (i.e., a student may be certified to VA for tuition and fees that are covered by any Title IV program).





## Policies: Reporting Fees

Covers the cost of administering VA programs.

The payment:

- Is made from VA to a school
- Is based on the number of students certified to VA at least once during the year and received VA educational benefits
- Is used for certifications or supporting programs for Veterans
- May include attendance at VA sponsored training conferences
- Fluctuates annually





## Policies: Reporting Fee Changes

The Harry W. Colmery Veterans Educational Assistance Act of 2017, Public Law 115-48 (Section 304), as amended by Public Law 115-62, Section 411, provided the following change, **effective August 1, 2018**:

- If a school receives reporting fees for 100 or more eligible students, the reporting fees paid to the school cannot be used for, or merged with, the school's general fund
- How your school uses its reporting fees will be reviewed during Compliance Surveys conducted at your school

Effective August 1, 2020:

- The payment rate for Reporting Fees was set to \$16.00
- Calendar year 2021 Fees will be paid in 2022
- There's no longer a separate higher Reporting Fee payment rate for students using advanced pay.





## Policies: The 85-15 Rule

Prohibits benefits to students where 85% or more have any portion of their fees paid by school or VA.

### *Ratio:*

If Supported students to Non-supported students exceeds 85% at the time a new VA student enters or reenters, the student cannot be certified.

### *Exemptions:*

Doesn't apply to students receiving Chapter 31 or Chapter 35 benefits.



## Policies: The 85-15 Rule

### How to report 85-15

- VA Form 22-10215 Statement of Assurance of Compliance with 85 Percent Enrollment Ratios.
- VA Form 22-10215a Statement of Assurance of Compliance with 85 Percent Enrollment Ratios Continuation Sheet.
- VA Form 22-10216 35% Exemption Request from 85/15 Reporting Requirement.
- FAQs [85/15 Frequently Asked Questions - Education and Training \(va.gov\)](#)





## How to Certify





# How to Certify (1 of 2)

The term "enrollment certification" refers to either the paper version of VA Form 22-1999 or the VA-ONCE version which is VA Form 22-1999-6.

Department of Veterans Affairs											Side
VA ENROLLMENT CERTIFICATION											A
<b>IMPORTANT:</b> Side A is for Institutions of Higher Learning or schools offering non-degree training.											
1. NAME OF STUDENT (First, Middle, Last)						2. VA FILE NO. (For chapter 35, include suffix. For Transferability cases, enter the veteran's social security number)					
3. CURRENT ADDRESS OF STUDENT						4. SOCIAL SECURITY NUMBER OF STUDENT (If not entered in Item 2)					
5. TYPE OF TRAINING						6A. NAME OF PROGRAM					
<input type="checkbox"/> UNDERGRADUATE COLLEGE DEGREE <input type="checkbox"/> GRADUATE OR ADVANCED PROFESSIONAL <input type="checkbox"/> NON-COLLEGE DEGREE						<input type="checkbox"/> FARM COOPERATIVE <input type="checkbox"/> HIGH SCHOOL <input type="checkbox"/> COOPERATIVE (Not Farm) <input type="checkbox"/> GUEST STUDENT (Supplemental School) (Complete Item 6C)					
						6B. IS STUDENT MATRICULATED AT YOUR FACILITY? (For V.A. purposes, a student is matriculated when formally admitted as a degree seeking student)					
						6C. IS PARENT SCHOOL LETTER ON FILE?					
						7. YELLOW RIBBON RECIPIENT					
ENROLLMENT DATA											
8. ENROLLMENT EFFECTIVE DATES (Month, Day, Year)		9. COURSES TAKEN			10. CLOCK HOURS PER WEEK	11. CHARGES FOR PERIODS OF INSTRUCTION		12. YELLOW RIBBON PROGRAM	13. TRAINING TIME (Graduate or Advanced Professional Program)		
A. BEGIN	B. END	TAKEN IN-RESIDENCE	TAKEN BY DISTANCE LEARNING	NON-CREDIT DEFICIENCY/ REFRESHER	HOURS	A. TUITION	B. FEES	AMOUNT			
		A. HOURS	B. HOURS	C. HOURS							
14. ADDITIONAL INFORMATION FOR HIGH SCHOOL AND FARM CO-OP COURSES											
A. HIGH SCHOOLS APPROVED ON A UNIT BASIS (Enter the number of high school units for which the student is enrolled)						B. FARM CO-OP ONLY (Is student pursuing course concurrently with substantially full-time agricultural employment averaging at least 40 hours per week?)					
						<input type="checkbox"/> YES <input type="checkbox"/> NO					
<b>ADVANCE PAYMENT REQUEST - (Note: Advance payment is not accelerated payment.) (See Special Instructions.)</b>											
<b>I REQUEST AN ADVANCE PAYMENT</b>						15A. SIGNATURE OF STUDENT			15B. DATE SIGNED		
<b>ACCELERATED PAYMENT REQUEST (Note: Accelerated payment is not advance payment.) (See Special Instructions.)</b>											
I request accelerated payment. I certify that I intend to seek employment in one of the following industries: Biotechnology, Life Science Technologies, Opto-electronics, Computers and Telecommunications, Electronics, Computer-integrated Manufacturing, Material Design, Aerospace, Weapons, or Nuclear Technology.											
<b>I REQUEST AN ACCELERATED PAYMENT</b>						16A. SIGNATURE OF STUDENT			16B. DATE SIGNED		
17. REMARKS											
<b>NOTE - Complete Item 18 only if course(s) are contracted out to another school or are given at a branch location other than shown in Item 19B. Do not complete item 18 if course(s) are taken at a branch or extension of a school as defined in 38 CFR 21.4266(c).</b>											
18. NAME AND ADDRESS OF CONTRACT SCHOOL OR BRANCH LOCATION											
<b>CERTIFICATIONS - The provisions described in paragraphs (1) through (14) on the attached sheet are certified.</b>											
19A. FACILITY CODE						19B. SCHOOL NAME AND ADDRESS					
19C. TELEPHONE NUMBER OF CERTIFYING OFFICIAL						19D. SIGNATURE OF CERTIFYING OFFICIAL			19E. DATE SIGNED		



## How to Certify (2 of 2)

Enrollment certifications must show name of the program as it appears in Web Enabled Approval Management System (WEAMS).

This name can be identified in Public WEAMS or on VA Form 22-1998 provided by your ELR.

The screenshot shows the 'WEAMS INSTITUTION SEARCH' page. At the top, it reads 'UNITED STATES DEPARTMENT OF VETERANS' with navigation links for 'Home', 'Veteran Services', and 'Business'. The main heading is 'WEAMS INSTITUTION SEARCH'. Below this is a 'Search Filters' section with the following fields:

- Institution Name:** A text input field.
- Program Type:** A dropdown menu currently set to 'Institution of Higher Le'.
- Yellow Ribbon School:** A dropdown menu with a downward arrow.

Below the filters is a note: '(Yellow Ribbon is determined per academic year that s'. Further down is a 'Select Country:' dropdown menu set to 'USA'. At the bottom, there are links for 'VA Home | Privacy Policy | FOIA | Web Policies' and the text 'U.S. Departm' and 'Revie'.



## Enrollment Periods (1 of 2)

- Standard quarters are 10 to 13 weeks in length and standard semesters are 15 to 19 weeks in length. Standard quarters and semesters adhere to the school's approved academic calendar.
- When a session or course doesn't follow this standard format, certify the actual begin date and end date for the session or course provided in your Academic Calendar and based on your SAA approval.
- Courses taken during a defined session – an eight-week summer session, for example – should be certified from the beginning date to the ending date of the session if the courses start the first week and end the last week of the session.
- If a standard term has a course beginning within 7 calendar days then the school should certify the course using the first day of the term. If a standard term is taken concurrently with a nonstandard term, the two must still be certified separately.





## Enrollment Periods (2 of 2)

**Example (Term after April 25, 2016):** A student is taking 9 credits for two 3 credit classes (held Tuesday and Thursday) and one 3 credit class (held Friday) during a standard term. The term began on a Friday. The school would submit one enrollment certification for this term for all 9 credits with a begin date of the first day of the term and the normal term end date.

**Example (Term after April 25, 2016):** A student is taking 9 credits during a nonstandard summer term. The term dates for those classes are:

- 07/01/16 – 08/01/16
- 07/07/16 – 08/01/16
- 07/13/16 – 08/13/16

In this example each of these terms would need to be certified separately because each term is a nonstandard term.





## Dates of Attendance (1 of 3)

The approved enrollment period determines the Starting and Ending Date.

### *Starting Date*

- Term – Start date identified on the school's academic calendar
- Non-term – First day the student attended class

### *Ending Date*

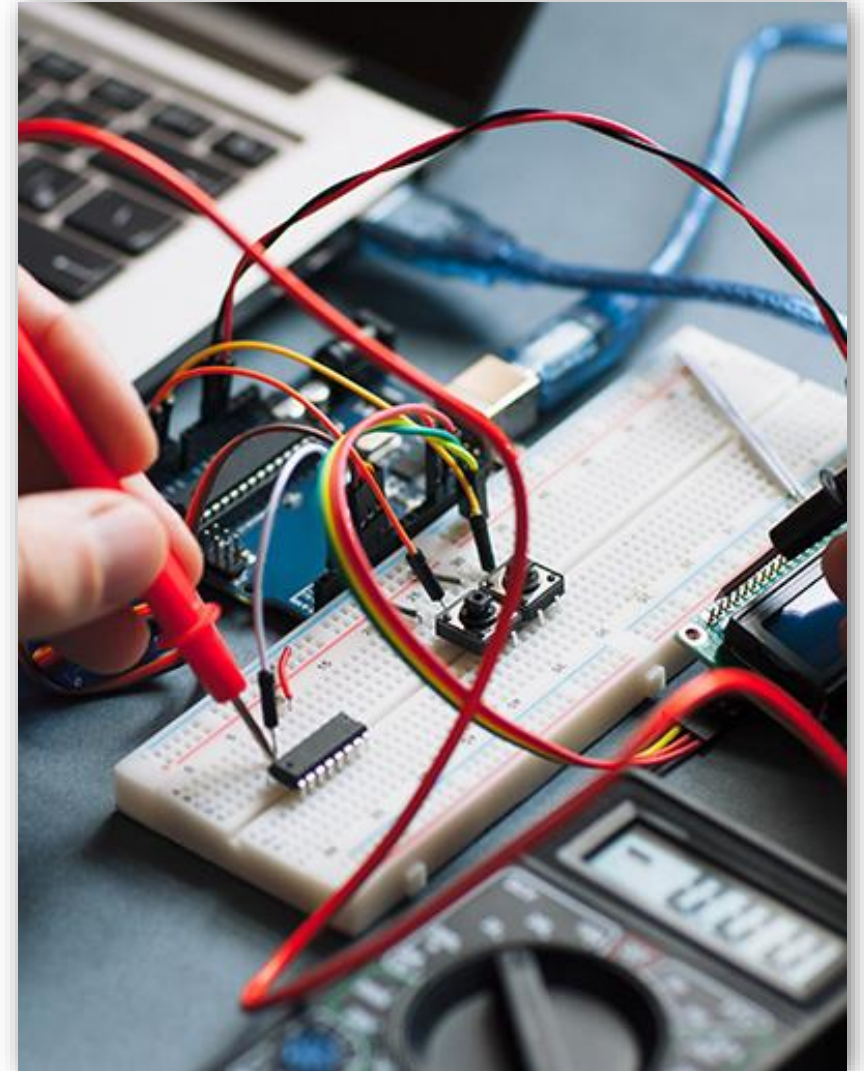
- Term – End date identified on the school's academic calendar
- Non-term – Last day the student attended class
- *For both term and non-term:*
  - If student graduate early, withdraw, or terminate enrollment, effective date is the last attendance date
  - Unsatisfactory attendance/progress terminates enrollment, effective date is the last attendance date



## Dates of Attendance (2 of 3)

Students are issued their certificate of completion once they learn all the competencies taught in the program.

VA pays to the point they earn their certificate or have sat in the classroom for the approved hours of the program – whichever comes first.





## Certifying Graduation

As of June 12, 2018, you must report graduation. This is certified in VA-ONCE as **END OF TERM OR COURSE**.





## Reporting Leave of Absence (1 of 3)

If leave of absence (LOA) requested, SCO will use an Amended Certification and provide a revised ending date if applicable.

### **Example:**

- The original certification was for January 5th to May 15<sup>th</sup>.
- Student began LOA on February 7th without a clear return date.

### **Action:**

- Amend Remarks section – LOA, 2/7 with the resume date of 5/14 (one day prior to certified period)
  - Prevents student payments during this period
  - Stops Books, Supply and MHA payments





## Reporting Leave of Absence (2 of 3)

### **Example:**

- The original certification was for the period January 5th to May 15th
- Student began LOA on February 7th without a clear return date.

### **Action:**

- Amend Remarks section – LOA, 2/7 with the resume date of 5/14 (one day prior to certified period)
  - Prevents student payments during this period
  - Stops Books, Supply and MHA payments

### **Student Returns:**

Student returned on March 5th (Amendment described in Example has been processed).

- Submit another amendment in VA-ONCE
- Remarks – LOA , 2/7 and student resumed training 3/5. Also adjust end date as needed.



## Reporting Leave of Absence (3 of 3)

### Example:

- The original certification was for the period January 5th to May 15th
- Student began LOA on February 7th without a clear return date.

### Action:

- Amend Remarks section – LOA, 2/7 with the resume date of 5/14 (one day prior to certified period)
  - Prevents student payments during this period
  - Stops Books, Supply and MHA payments

### Student Does Not Return:

Student doesn't return by certified end date (Amendment described in Example has been processed).

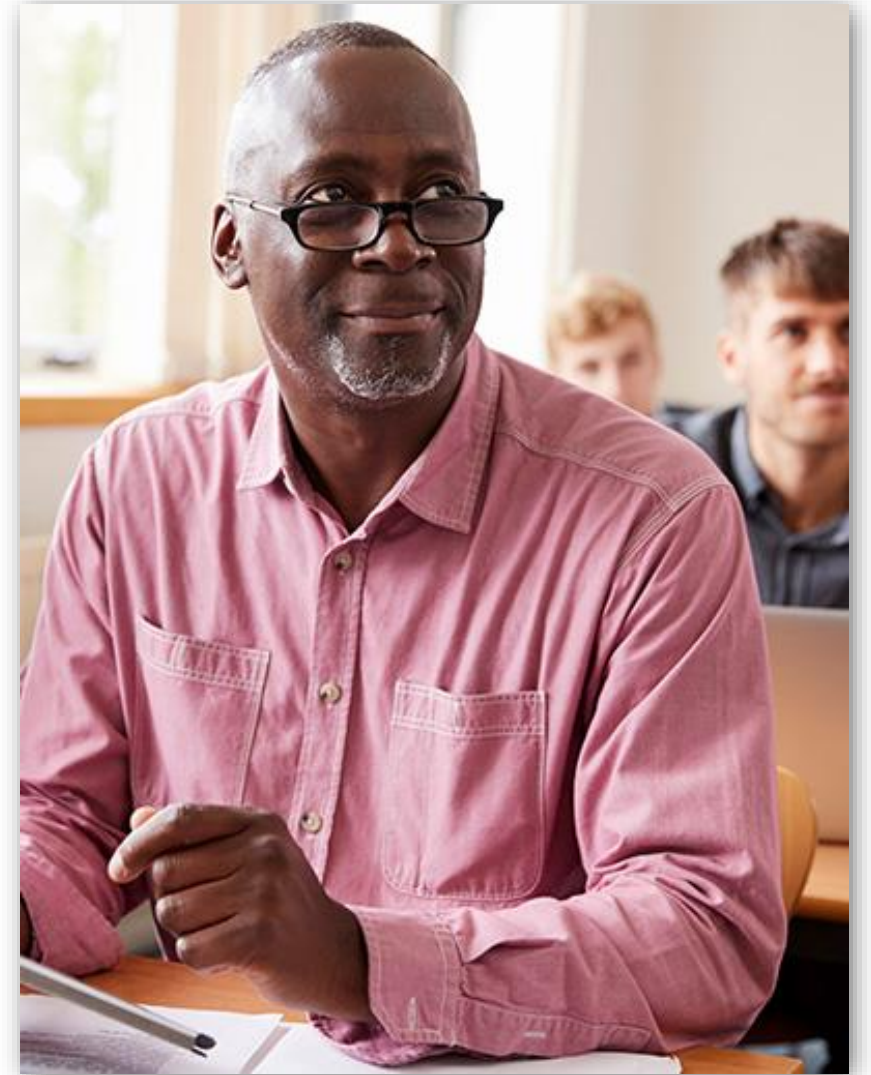
- Submit a termination in VA-ONCE
- Use correct last attendance date
  - This will result in a tuition and fee debt to the student



## Certify Tuition (1 of 3)

When you certify tuition:

- Certify the actual amount of tuition charged
- Doesn't include Title IV payments for tuition and fees (i.e. Pell Grants)
- 3<sup>rd</sup> party payments **are not** deducted from tuition certified to VA





## Certify Tuition (2 of 3)

If a student is eligible for Chapter 33 benefits and the school has a program to pay unmet charges, such payments must be deducted from the total charges certified.

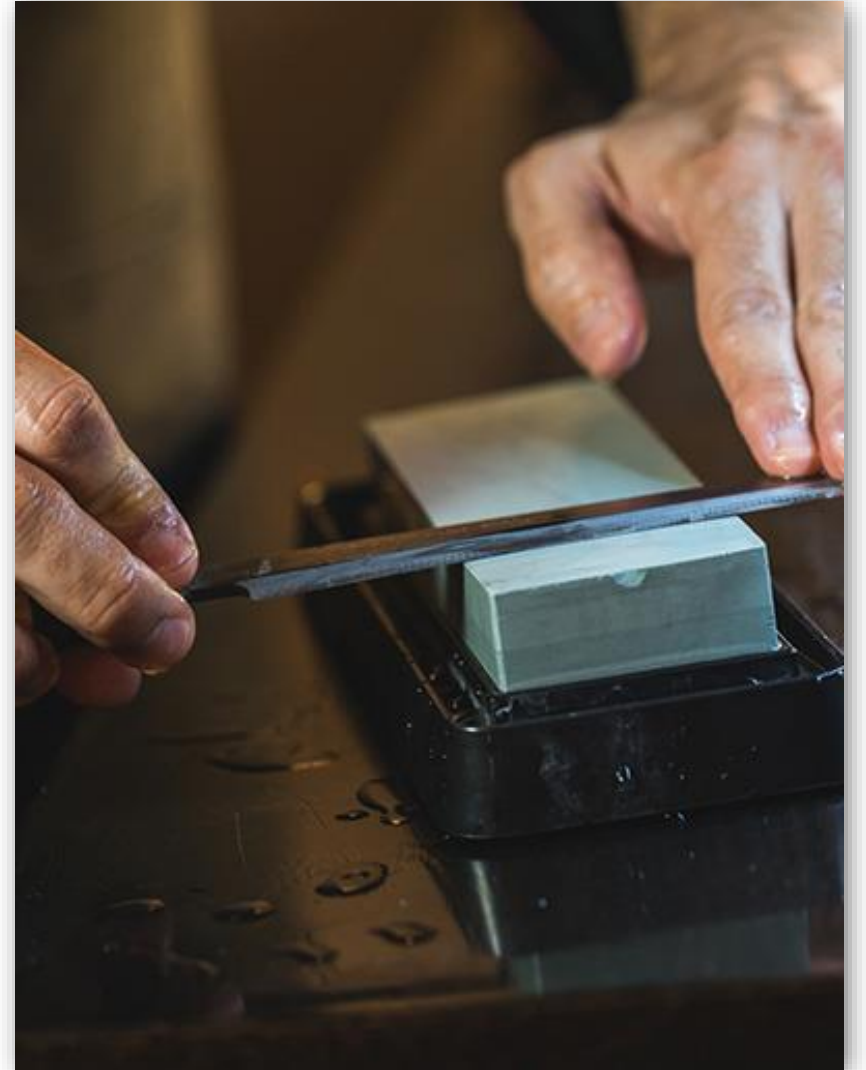




## Certify Tuition (3 of 3)

Before a fee is certified, it must meet the following requirements:

- Listed in the school's catalog as a fee
- Listed on the student invoice/payment ledger as a fee
- Listed in the enrollment agreement/contract as a fee
- Not considered a pre-admission or penalty fee
- Mandatory or otherwise required of all students





## Section Review

For NCD courses, the school should show the specific approved course. If the course is not an exact match in WEAMS (VA Form 22-1998), you should still move forward.

- A. True
- B. False



## Section Review

For NCD courses, the school should show the specific approved course. If the course is not an exact match in WEAMS (VA Form 22-1998), you should still move forward.

- A. True
- B. **False**



## Section Review

Before a fee can be certified to VA, it must meet certain requirements. (Select all that apply.)

- A. Be listed in the school's approved catalog as a fee.
- B. Be listed on the student invoice/payment ledger as a fee.
- C. Be listed in the enrollment agreement/contract between the student and school as a fee.
- D. Not be considered a preadmission or penalty fee.
- E. Be mandatory or otherwise required of all similarly circumstanced students, without exception.





## Section Review

Before a fee can be certified to VA, it must meet certain requirements. (Select all that apply.)

- A. Be listed in the school's approved catalog as a fee.
- B. Be listed on the student invoice/payment ledger as a fee.
- C. Be listed in the enrollment agreement/contract between the student and school as a fee.
- D. Not be considered a preadmission or penalty fee.
- E. Be mandatory or otherwise required of all similarly circumstanced students, without exception.



## Compliance Surveys



# Record Keeping Requirements



## Must retain the following records

- Records to reflect tuition and fees charged and paid
- Records of Previous training and evaluation
- Records for grades and progress
- 85/15 Reports
- Advertising
- Attendance records if required and conduct records
- Must retain for 3 years after student completes program
- This list may not be complete to demonstrate compliance with educational assistance under 10 U.S.C. and 38 U.S.C.



# The Buckley Amendment



- The Buckley Amendment (Public Law 93-380) requires institutions receiving Federal funds administered by the Department of Education to obtain the student's consent to release information from school records.
- However, information sought in connection with a student's application for receipt of financial aid is exempt.
- School records relating to VA benefits fall into the "financial aid" category and are therefore exempt from the provisions of the Buckley Amendment.
- Therefore, during Compliance Survey visits, you must grant the VA (and SAA) access to the records of VA beneficiaries as well as non-VA students without the written consent of the student in order to monitor the school's compliance with the law.



## Best Practices

A close-up photograph of a hand holding a pen, marking a checklist. The checklist has four columns labeled "Excellent", "Good", "Fair", and "Poor". The "Good" column has three checked boxes, and the "Fair" column has one checked box. The text "With the following items?" is visible at the top of the checklist.

Follow this list of Best Practices:

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



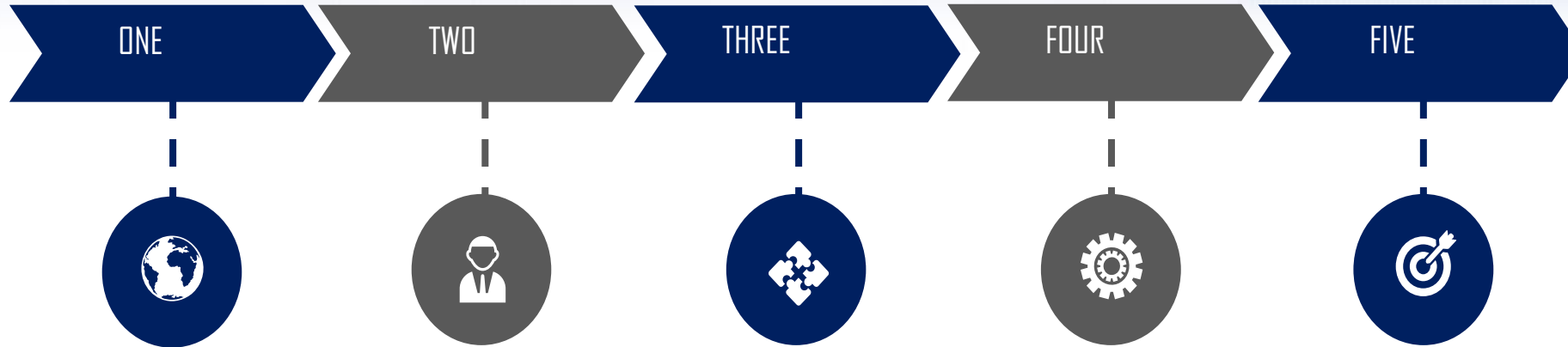
You should be able to:

- Describe the methods for measuring courses at an NCD facility
- Identify policies that must be followed for certifying benefits at an NCD facility
- Describe the Certification Processes for VA Education Benefits
- Identify some best practices for schools.





# CONFERENCE/VIRTUAL TRAINING CREDIT PROCESS



## 1. ATTEND

Attend a National, Regional, Local Conference or Workshop offering eligible SCO Annual Training. Training must be taught or co-taught with an ELR or VA staff member.

## 2. RECORD

Record your attendance using the MENTI code given at the session or an alternative attendance tracking method designated by presenter.

## 3. CERTIFY

Go on the [SCO Training Portal](#) and certify each conference session you attended. By completing this form you are certifying that you attended this training in-person and documented your attendance at the conference training session.

## 4. PRINT

Print your certificate and keep for your records.

## 5. PROFILE

Check your profile to make sure all of your online and conference credit is properly counted.



## FY'22 Qualifying Training Topics – All SCOs

[School Certifying Official \(SCO\) Training - Education and Training \(va.gov\)](https://www.va.gov)





# Updated Training Dates & Resources



October 1, 2021



**Annual Training Window Opened** Updated training requirements for all new SCOs and continuing education requirements for existing SCOs are effective

June 2, 2022



**90-Day Training Alert!** Notifications and reminders of the approaching August 31<sup>st</sup> continuing education deadline will be posted on the GI Bill website and sent to SCOs via Gov Delivery notice

July 2, 2022



**60-Day Training Alert!** Notifications and reminders of the approaching August 31<sup>st</sup> continuing education deadline will be posted on the GI Bill website and sent to SCOs via Gov Delivery notice

August 1, 2022



**30-Day Training Alert!** Notifications and reminders of the approaching August 31<sup>st</sup> continuing education deadline will be posted on the GI Bill website and sent to SCOs via Gov Delivery notice

August 31, 2022



**Annual Training Window Closes!** Continuing education requirements for existing SCOs completed

## SCO Web Resources

- [GI Bill Webpage – Colmery Act](#)
- [School Certifying Official's \(SCO\) Handbook](#)
- [ELR of Jurisdiction](#)
- [School Certifying Official \(SCO\) Training 2019](#)



**Thank you for your time today!**