



Florida Association of Veteran Education Specialists (FAVES) State Conference

The School Certifying Official's Responsibilities



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LEARNING OBJECTIVE

Upon completion of this training, you will become familiar with the responsibilities of the School Certifying Official.



SCO RESPONSIBILITIES - GENERAL



Retain files of VA papers submitted and records of academic progress, program pursuit, etc.



Maintain records for at least three years following the student's last date of attendance.



Ensure that records are kept in a safe place and that the privacy of VA students is protected. Records can be kept as either hard copy or electronic.



Monitor and maintain Annual Reporting Fee payments. Ensuring the facility is spending the funds as intended and keeping the funds in a separate account, if applicable.



Monitor compliance with the 85/15 regulation.



Attend VA training opportunities and stay current with yearly training requirements.



THE ROLES OF THE SCHOOL CERTIFYING OFFICIAL

The School Certifying Official (SCO) consists of three important roles in the VA education process:

- Initiator
 - State Approving Agency (SAA) – SCO initiates communication for initial facility approval and continued approval-based changes that occur at their facility
 - Education Liaison Representative (ELR) – SCO initiates communication to the ELR for certification-based questions and non-approval-based changes
- Liaison
 - VA Beneficiaries – SCO acts as liaison between VA and VA education beneficiaries at their facility. Provides information and updates to students as applicable, and certifies their enrollment information to VA
 - Facility – SCO acts as liaison between VA and their facility's administration to communicate regulatory changes as necessary
- Facilitator
 - Serves as the main point of contact (POC) for a compliance survey and is responsible for making arrangements for workspace and documentation gathering for the Compliance Surveyor.



SCO RESPONSIBILITIES – FACILITATOR

Compliance Surveys

The primary SCO(s) are the main point of contact(s) for any compliance survey. As the main point of contact, the SCO will:

- Assist in establishing a survey date and time with the surveyor
- Gather and compile the requested and required survey data for each student in the survey
- Participate in the Entrance and Exit briefing
- Be able to explain the source documentation for each student in the survey
- Be available throughout the day in case the surveyor has questions concerning their findings
- Be solution-orientated towards addressing/correcting any findings on the current survey, and thinking ahead to find ways to problems that could lead to discrepancies on future compliance surveys

An SCO is not required to be at the compliance survey. It can be anyone from the facility that can speak to what is in the records. DON'T let this be a reason to reschedule a survey, if at all possible.



SCO RESPONSIBILITIES – PRIOR CREDIT

A criteria for approval of any facility for Veterans' training, is the requirement that it reviews prior credit, and grant credit, as appropriate, to a VA student's current program. This is found in [CFR 21.4253\(d\)\(3\)](#) and [21.4254\(C\)\(4\)](#). In essence, this requires every approved school to have and enforce a policy regarding transfer courses, credits, and previous experience.

Schools must evaluate prior credit, grant credit as appropriate, notify the student of the evaluation, and shorten the program certified accordingly. VA will review credit evaluations during compliance surveys, and credit evaluation records must be kept and made available to VA upon request.

Military education and training should be evaluated for prior credit. Information needed to evaluate military education and training is available online.



SCO RESPONSIBILITIES - CERTIFICATION

Certified courses:

Must be part of a program that is approved by the SAA of jurisdiction and accepted by VA. This means that a facility cannot certify a student for a program that does not appear on it's WEAMS report (VA Form 22-1998).

Must be in line with the student's degree plan or learning objectives.

Cannot be a repeat of a previously successfully completed course (unless it's during a rounding out term – more on rounding out later)

Must have any changes in enrollment reported promptly. An SCO has 30 days from the date of change to have it reported to VA.

Must be part of a program that is compliant with the 85/15 regulation for first time enrollment (except for Chapter 31 and Chapter 35); otherwise, no reporting bar.



SECTION 1010 REQUIREMENT

PL 116-315 Section 1010, Isakson and Roe Veterans Health Care and Benefits Improvement Act of 2020, became effective August 1, 2021.

For chapter 33 beneficiaries, schools are required to submit both an original enrollment certification and a second enrollment verification for each term to ensure the beneficiary is progressing in their training.



SECTION 1010 SCO REQUIREMENTS

Schools are required to submit an initial enrollment certification for each beneficiary, and a subsequent enrollment certification (verification) after the school's drop-add period.

The end of the drop-add period is the last day when a beneficiary can withdraw from the course or program without penalty. Without penalty refers to the first consequence in the term, be it financial or academic penalty.

The second certification (verification) should be received no later than 30 days after the school's drop-add period or 60 days from the first day of the enrollment period, whichever occurs first.



SCO RESPONSIBILITIES - CERTIFICATION

Term Dates

Standard Terms – Classes that begin and end in the same **calendar week** can be certified as the term start and end date

- Semesters – a standard term for a semester is between 15 and 19 weeks
- Quarters – a standard term for a quarter is between 10 and 13 weeks

Non-Standard Terms – Classes that have begin and end dates that are outside of the calendar week from the start and end dates of the standard term

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



SCO RESPONSIBILITIES - CERTIFICATION

Modality – Resident versus Distance

For all terms beginning **on or after August 15, 2019** School Certifying Officials (SCOs) will certify all courses which combine classroom instruction and distance learning (commonly known as hybrid courses) as in-residence training. These procedures are **NOT retroactive** and terms beginning on or before August 14, 2019 will not be amended to account for these changes



SCO RESPONSIBILITIES - CERTIFICATION

Modality – Resident versus Distance

Hybrid training must have at least one session that meets the definition of a standard class session (i.e. one 50-minute class,) but does not have to meet weekly.

The school's approval must specifically include resident and distance learning to report "hybrid" courses to VA. If both modalities are approved, qualifying "hybrid" courses should be reported as "res" on the enrollment certification.



SCO RESPONSIBILITIES - CERTIFICATION

Schools with multiple standard and non-standard terms occurring at the same time:

- Do not lump hours together
- Certify each identified term separately

Resident, Distant, Remedial, and Clock hours are reported separately for all chapters

Edit Enrollment Save Cancel

Facility: 11999999 Trng Type: IHL_UNDERGRAD Prgrm: SCO Prior Credit: **2**

Term Name	Begin Date*	End Date*	Res	Dist*	R/D	Clock	T & F*
MAY 2019	05/20/2019	07/04/2019	8	2	2		1200.00

Advance Pay Accelerated Pay (high-tech courses only)

LDA/EFF Date

Graduate Students enrollments in VA once have an additional box that requires the number of hours considered fulltime by the school (for that term). Reporting the graduate fulltime modifier is only applicable to Chapter 33. For Non-Chapter Chapter 33's, the school must select the appropriate training time (1/2, 3/4, FT, etc.).



SCO RESPONSIBILITIES - CERTIFICATION

Enrollment Changes

For any enrollment change, the SCO must report the change within 30 days of the action date.

For a reduction in hours:

- Report new costs as if the student were enrolled in the reduced amount of hours from the beginning of the term
- VA will make any necessary proration calculations

Last Date of Attendance and/or Effective Date (LDA/EFF)

- One of these values is required to be reported on every enrollment change

Mitigating Circumstances (MITC)

- Mitigating Circumstances should only be reported to VA if the facility has evidence of the situation on file at the facility. A list of Mitigating Circumstances can be found in the SCO Handbook.
- Without documentation, refer the student to work directly with VA



SCO RESPONSIBILITIES - REPORTING

Mitigating Circumstances

Unanticipated and unavoidable events beyond an eligible individual's control which are responsible for the eligible individual's inability to complete a course or courses or which result in the eligible individual's receipt of a non-punitive grade for a course the eligible individual did complete. Generally, an eligible individual will be required to submit corroborative evidence to substantiate his or her reasons for being unable to complete a course with a creditable grade.

If mitigating circumstances are needed and adequate evidence of mitigating circumstances isn't received, VA will not pay for the course(s) in question. If the student has already been paid for the course or courses, VA will create an overpayment (subject to the 6-Credit Hour Exclusion) from the beginning of the term.

If mitigating circumstances are an issue for the adjustment or termination reason, the SCO must select one of the examples in VA- ONCE, which displays a Mitigating Circumstance from its drop-down box. Schools are required to submit a description of the mitigating circumstances when reporting the reduction or termination. Schools must report the reason for the reduction or withdrawal and have evidence on file; the Veterans Claim Examiner (VCE) should consider it as the claimant's statement. If additional corroborative documentation is needed to substantiate the reason for the withdrawal or reduction, the VCE should be developing directly to the claimant/student.



SCO RESPONSIBILITIES - CERTIFICATION

Remedial Courses

Remedial and deficiency courses are those that are designed to correct deficiencies in basic Mathematics, English, and Reading at the elementary, or secondary level.

These courses can be certified as part of an approved program, but only for students for whom a verifiable need has been established.

Any "placement test" results and other applicable documentation should be kept in the student's file in order to support the student's need for remedial and deficiency courses.

Remedial and deficiency courses offered as independent study (online) cannot be approved and cannot be certified to VA.

If a student fails to meet the objective of the remedial course, they may continue to take the course until they have met the criteria to advance.

If the student passes the remedial course and then fails the next level they can not repeat the remedial course in which they have already demonstrated proficiency.



SCO RESPONSIBILITIES - CERTIFICATION

Special COVID-19 Provisions End

On June 1, 2022, COVID-19 legislation permitting students to receive the Monthly Housing Allowance (MHA) at the resident (in person) rate, while taking approved courses converted to online training due to COVID-19 will have ended.

If your institution is operating in an unapproved modality, due to the COVID-19 pandemic, you must return to the approved modality before COVID-19 provisions were effective. Returning to your approved modality should have occurred on or before June 2, 2022.



RECAP “APPROVED”



If your institution is approved for online training (typically applies to most IHLs):

- VA will continue to pay currently enrolled students, with terms spanning June 1st at the resident (in-person) rate through the end of the month or term, whichever occurs first.
- Students enrolling for courses beginning after June 1, 2022, will need to enroll in approved resident (in person) classes to continue receiving their MHA at the resident rate. Otherwise, they will receive the online rate, which is half the national average.



NOT APPROVED

RECAP “NOT APPROVED”

If your institution is NOT approved for online training (typically applies to most Non-College Degree (NCD) Facilities:

- For terms spanning June 1, 2022, students will need to return to resident (in person) training on June 2, 2022, in order to continue receiving GI Bill® benefits.
- Benefits for students not returning to in-resident classes will be terminated on June 02, 2022.
- Students enrolling for courses beginning after June 01, 2022, will need to enroll in approved resident (in person) classes to receive GI Bill® benefits.
- Note: Please be advised, that VA will pay through the end of the month, but it will still be a reporting violation, if students are permitted to train online after the June 01, 2022 deadline; it also may impact school's approval.



Rollback of COVID Certification 1 of 2

Did the certification (spanning 06/01/22) contain the remark "COVID-19 Residence Courses Taken Online"? If so, a corrected COVID-19 certification will need to be submitted.

If the certification (spanning 06/01/22) did NOT contain the remark "COVID-19 Residence Courses Taken Online", a corrected COVID-19 certification is not necessary.



Choose  VA



U.S. Department
of Veterans Affairs

Rollback of COVID Certification 2 of 2

If a term that spans June 01, 2022, has not been certified yet and the certification will include converted courses, please certify using current COVID provisions. Then follow the updated COVID procedures to adjust the certification.

Note: The initial certification and the adjustment should not be submitted on the same day. Please submit the adjustment the day after you submit the initial certification.

Important: Even if the student's MHA will not be affected by an adjusted certification, it must still be provided for compliance purposes.



Choose **VA**



U.S. Department
of Veterans Affairs

IHL - COVID-19 CERTIFICATION SCENARIO #1

A SCO is required to take the following steps when a student is enrolled during a period spanning June 01, 2022, with converted COVID courses:

If the student is attending **all Resident courses, all Online courses** or a mix of **Resident and Online courses**, the SCO must adjust the certification:

- Report the actual type of hours the student is attending (resident and/or distance)
- Choose “other” for the adjustment reason
- Enter 6/01/22 in the LDA/EFF date box
- Choose the standard VBA remark “**Converted courses spanning 6/01/22**”



IHL - COVID-19 CERTIFICATION SCENARIO #2

A SCO is required to take the following steps when a student is enrolled during a period spanning June 01, 2022, with converted COVID courses:

If the student is attending any clock hour courses the SCO must adjust the certification:

- Report the actual type of hours the student is attending (clock, resident, and/or distance)
- Choose “other” for the adjustment reason
- Enter 6/1/22 in the LDA/EFF date box
- Choose the standard VBA remark reflecting the modality of the clock hours
“**Converted courses spanning 6/01/22. Clock hours are resident**” or
“**Converted courses spanning 6/01/22. Clock hours are online**”



NCD - COVID-19 CERTIFICATION SCENARIO #1

A SCO is required to take the following steps when a student is enrolled during a period spanning June 01, 2022, with converted COVID courses:

If the student has returned to fully in resident training the SCO must adjust the certification

- Choose “other” for the reason for adjustment
- Enter 6/01/22 in the LDA/EFF date box
- Choose the standard VBA remark “**converted courses spanning 6/01/22. “Student resumed resident training on or before 6/01/22”**”



NCD - COVID-19 CERTIFICATION SCENARIO #2

A SCO is required to take the following steps when a student is enrolled during a period spanning June 01, 2022, with converted COVID courses:

If the student has not returned to fully in resident training the SCO must terminate the certification

- Choose “other” for the reason for termination
- Enter 6/01/22 in the LDA/EFF date box
- Choose the standard VBA remark “***converted courses spanning 6/01/22. Student did not resume resident training on or before 6/01/22***”



SCO RESPONSIBILITIES - CERTIFICATION

Yellow Ribbon Program

Eligible students must be using Chapter 33 at the 100% level

Certify up to half of the unmet charges, per the facility's Yellow Ribbon agreement, for VA to match the contribution

Public School:

- Difference between In-State Net Costs and Out-of-State Net Costs

Private School:

- School Year 2018/2019 \$23,671.94
- School Year 2019/2020 \$24,476.79
- School Year 2020/2021 \$25,162.14
- School Year 2021/2022 \$26,162.81



SCO RESPONSIBILITIES - CERTIFICATION

Enrollment Changes

For students that are using **Chapter 33**:

- All changes need to be reported
 - Dates of a term or course
 - Hours –
 - If the total number of hours changes
 - If the type of hours changes
 - Any applicable costs

For students using any benefit chapter other than Chapter 33:

- Changes need to be reported when there is a change in:
 - Dates of a term or course
 - Training time that changes the payable benefit level
 - Reportable costs (where applicable)



SCO RESPONSIBILITIES - REPORTING

Keep VA informed of the enrollment status of Veterans and other eligible persons. Use basic forms to keep VA informed, such as (routinely reported through VA Once):

- Enrollment Certification (VA Form 22-1999) to report required enrollment information
- Notice of Change in Student Status (VA Form 22-1999b) to report changes to enrollment information

Report only the required coursework that a student is enrolled in, for only the approved program that they are enrolled in

Report student's grades in accordance with the facility's attendance requirements (where applicable), and report when a student was terminated due to unsatisfactory progress

Report tuition and fee charges assigned to VA beneficiaries and ensure that only certifiable charges are submitted to VA for potential reimbursement.

Please note: In addition, SCOs must monitor to ensure attendance is within their published policy and/or report, if determined unsatisfactory due to grades or attendance.



SCO RESPONSIBILITIES - REPORTING

Suspensions

Unsatisfactory Progress (Academic Suspension) must be reported to VA as a termination.

SCOs should terminate the semester the student is suspended. If suspension follows the fall semester, for example, terminate fall semester. Choose “Unsatisfactory Attendance, Conduct, or Progress” as the reason.

Edit Termination Save Cancel

Facility: 11999999 Trng Type: IHL_UNDERGRAD Prarm: BS_BOWLING Prior Credit: 2

Term Name: MAY 2019 Begin Date*: 05/20/2019 End Date*: 07/04/20

Advance Pay Accelerated Pay (high-tech courses only)

LDA/EFF Date: 07/04/2019

Remarks:

- End Of Term Or Course
- Graduation
- Unsatisfactory Attendance, Conduct, Or Progress**
- Withdraw Before Beginning Of Term
- Withdrawal After Drop Period - Non-Punitive Grades Assigned
- Withdrawal After Drop Period - Punitive Grades Assigned
- Withdrawal During Drop Period
- Withdrawal Or Interruption (Noncollege Degree Programs Not On A Term Basis)
- Preregistered But Never Attended
- Other (Explain In Remarks)



SCO RESPONSIBILITIES - REPORTING

Suspensions

VA-ONCE will insert the end date of the term as the default “LDA/EFF Date”. The SCO will need to pay special attention to this action to ensure it is the correct date.

If the date needs to be changed, this data field is editable.

Edit Termination [Save] [Cancel]

Facility: 11999999 Trng Type: IHL_UNDERGRAD Prorg: BS_BOWLING Prior Credit: 2

MAY 2019 | 05/20/2019 | 07/04/2019

Term Name | Begin Date* | End Date*

Advance Pay | Accelerated Pay (high-tech courses only)

07/04/2019
LDA/EFF Date

Remarks

End Of Term Or Course

- Graduation
- Unsatisfactory Attendance, Conduct, Or Progress**
- Withdraw Before Beginning Of Term
- Withdrawal After Drop Period - Non-Punitive Grades Assigned
- Withdrawal After Drop Period - Punitive Grades Assigned
- Withdrawal During Drop Period
- Withdrawal Or Interruption (Noncollege Degree Programs Not On A Term Basis)
- Preregistered But Never Attended
- Other (Explain In Remarks)



SCO RESPONSIBILITIES – ROUNDING OUT

Historically, Education Service (EDU) has allowed the practice of “rounding out” in which an Institution of Higher Learning (IHL) school could certify courses which were not a part of the beneficiary’s approved program of education to increase a beneficiary’s training time during their final academic term.

By authorizing payment for these extra courses, GI Bill® students were eligible for full benefit payments, and maximum allowable monthly housing allowance (MHA) under chapter 33.

VA amended its policy effective August 1, 2021, to specify that any additional class(es) taken during the beneficiary’s final academic term for the purpose of increasing training time or rate of pursuit, up to full-time for Rounding Out, while not required for the beneficiary to graduate, **are:**

1. Included within the program and would count toward an enrolled individual’s graduation requirements – as specified in the curriculum
2. Have not been already completed. – Cannot retake a class that has already been successfully completed.
3. Please note: Rounding Out works for all benefits, not just Chapter 33.



SCO Responsibilities - Certification

Prohibited Payments – Items that VA education benefits cannot pay towards

- Repeats of successfully completed coursework
- Classes that do not meet program requirements (Rounding out may impact this)
- Non-attendance at those facilities that have an existing attendance policy
- Non-punitive grades (grades not impacting GPA)
- Audited courses or courses where no credit is sought or attained
- Courses for training in areas in which the beneficiary has already been deemed “qualified” through other training or means
- Online remedial courses
- A Leave of Absence (LOA)



SCO RESPONSIBILITIES - MONITORING

“Walk Away” Students

A “walk away” student is a student that stops attending their course but does not officially withdraw from the course.

Schools with an established attendance policy must monitor compliance with their policy, enforce the policy, and report punitive grades and terminations due to violations of the policy to VA.

Absences that do not violate the established attendance policy do not need to be reported.

Schools that do not have an established attendance policy are not required to report punitive grades received due to instances of “walking away.”



SCO RESPONSIBILITIES – 85/15 RULE

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.

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.



CERTIFYING OFFICIAL RESOURCE LINKS

CERTIFYING OFFICIAL RESOURCE LINKS	
VBA Education Service Monthly Office Hours	<u>VBA Education Office Hours</u>
School Certifying Official Handbook	<u>School Certifying Official Handbook</u>
GI Bill® Website – School Resource Page	<u>School Resource Page</u>
GI Bill® Website – Frequently Asked Questions (FAQs)	<u>GI Bill® Website - FAQs</u>
Certifying Official Training Portal	<u>School Certifying Official (SCO) Training</u>
VA-ONCE Quick Reference User Guide	<u>VA Once Quick Reference User Guide</u>
Debt Management Center (DMC)	<u>Ask VA</u> and 1-800-827-0648
Work Study	<u>Ask VA</u>
Veteran Readiness & Employment (VRE)	<u>Veteran Readiness And Employment (VR&E)</u>
VRE Certifying Official Handbook	<u>VRE SCO Handbook</u>
85/15 FAQs	<u>85/15 Frequently Asked Questions</u>



CERTIFYING OFFICIAL TRAINING SELF-CERTIFICATION STEP-BY-STEP

1. Click on the URL below or Copy and Paste in your web browser

<https://vba-tpss.vbatraining.org/assess/trkSignIn?refid=XSCO>

2. Enter your email address and eight (8) digit facility code, then click Next

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



LEARNING OBJECTIVES

Having completed this training, you should be:

Familiar with the responsibilities of the School Certifying Official.



Choose VA



U.S. Department
of Veterans Affairs

THIS CONCLUDES TRAINING

Thank You!

