

School Certifying Official (SCO) Responsibilities



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Introduction



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RESPONSIBILITIES

RESPONSIBILITIES EVERYWHERE

Overview

As an SCO, you will wear many “hats” and take on a variety of tasks to assist your students and the VA in helping our Veterans and their beneficiaries achieve their educational goals. This training is a high-level introduction to the pertinent information you will need to know in order to be successful in your new job as an SCO.

Learning Objectives



01

Apply current VA Rules and Policies to your role as a SCO

02

Report accurate, complete, and timely information to VA

03

Explain the SCO role in Compliance Surveys



VA Rules and Policies





Rules and Policies

- Principles of Excellence
- Public Law 116-315, Section 1018
- Veterans Benefits and Transition Act of 2018
- Benefits and Transition Act of 2018 Waiver
- Reporting Fees
- 85/15



Principles of Excellence



**Executive
Order 13607**



Established for educational institutions serving service members, Veterans, spouses, and other family members



Schools should adhere to the “Principles of Excellence” to provide high-quality student support and service



Compliance with these principles is assessed during compliance surveys at participating schools



If the box next to “Executive Order 13607” on VA Form 22-1998 is checked, your school has agreed to abide by the “Principles of Excellence



Public Law 116-315, Section 1018



**Effective
August 1, 2021**

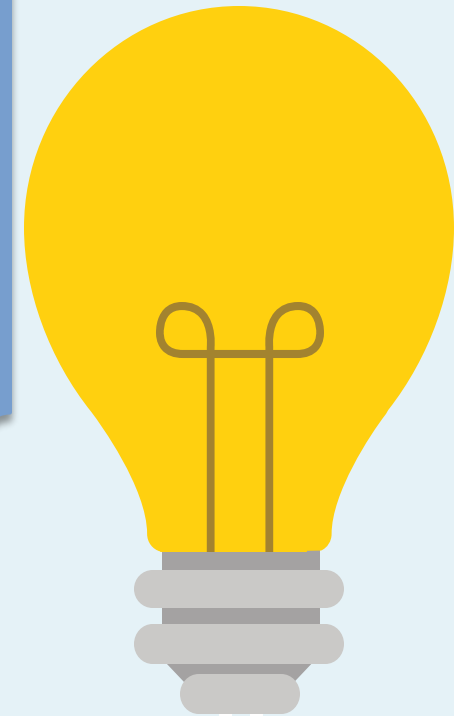
**Section 1018
codifies in statute
two additional
requirements:**

Requirement 1:

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

Requirement 2:

The State Approving Agency will take action when a school violates specific provisions of the Law.



Veterans Benefits and Transition Act of 2018



Requirements

- Requires the SAA, or the VA, when acting as the SAA, to disapprove programs of education that do not permit individuals using benefits under either Chapter 31 or 33, to attend or participate in courses while awaiting payment from the VA.
- Educational institutions must have a policy in place allowing an individual to attend or participate in a program of education if the individual provides the school with a Certificate of Eligibility (COE).

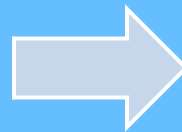
Non-Compliance

- SAAs are not required to immediately disapprove non-compliant schools. Instead, if an SAA determines that a school is not in compliance, it will take appropriate corrective action.
- Schools have 60 days to come into compliance or receive a waiver. If the school does not come into compliance or receive a waiver within 60 days, the SAA should withdraw approval.

Benefits and Transition Act of 2018 Waiver



Waiver requests must contain



Reasons the school has not been able to come into compliance



Target date for the school to come into compliance

What steps the school has taken to come into compliance

Detailed plan (including timeline)

What steps are still required

What has prevented the school from completing these steps thus far

What will prevent school from completing these steps within the 60 days

Reporting Fees



At the beginning of each calendar year, a listing of students who were receiving assistance during the previous calendar year is printed by VA for each institution. Schools are provided a reporting fee based on the number of students who were receiving VA educational benefits and certified to VA at least once during the year.

2011

OCT 1st

Public Law 111-377 (Section 204)
clarified “any reporting fee paid to an educational institution or joint apprenticeship training committee shall be utilized by such institution or committee solely for the making of certifications or for otherwise supporting programs for Veterans.”

2018

AUG 1st

Public Law 115-48 (Section 304)
If a school receives reporting fees for 100 or more eligible students, then the reporting fees paid to the school cannot be used for, or merged with, the school’s general fund.

2018

AUG 1st

Public Law 115-48 (Section 304)
How your school uses its reporting fees will be reviewed during Compliance Surveys conducted at your school.

\$16

85/15 Rule



85/15 Ratio Requirement

prohibits paying VA benefits to students enrolling in a program when more than 85% of the students enrolled in that program have any portion of their tuition, fees, or other charges paid for them by the school or VA.

If the Ratio

of Supported student to Non-Supported students exceeds 85% at the time a new VA student enters or re-enters the student cannot be certified to received benefits in the program.

ETIs Need

to use VA Form(s) 22-10215 and 22-10215a (if needed) to report 85/15 calculations for any programs not otherwise exempt.

All required information on the form(s) must be completed and all approved concentrations must be listed separately on the report.

- If the ETI is structured on a term, quarter, or semester basis, 85/15 calculation must be submitted to the ELR of jurisdiction no later than 30 calendar days after the start of the regular term.
- If the ETI is not structured on a term basis, 85/15 calculations must be submitted to the ELR of jurisdiction no later than 30 calendar days after the beginning of each calendar quarter.

Knowledge Check

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



TRUE



FALSE

Knowledge Check

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



TRUE

Responsibilities for Reporting





Responsibilities for Reporting

- Contact Information
- VA Form 22-8974
- Enrollment Manager
- Certification
- Standards of Progress (SoP)

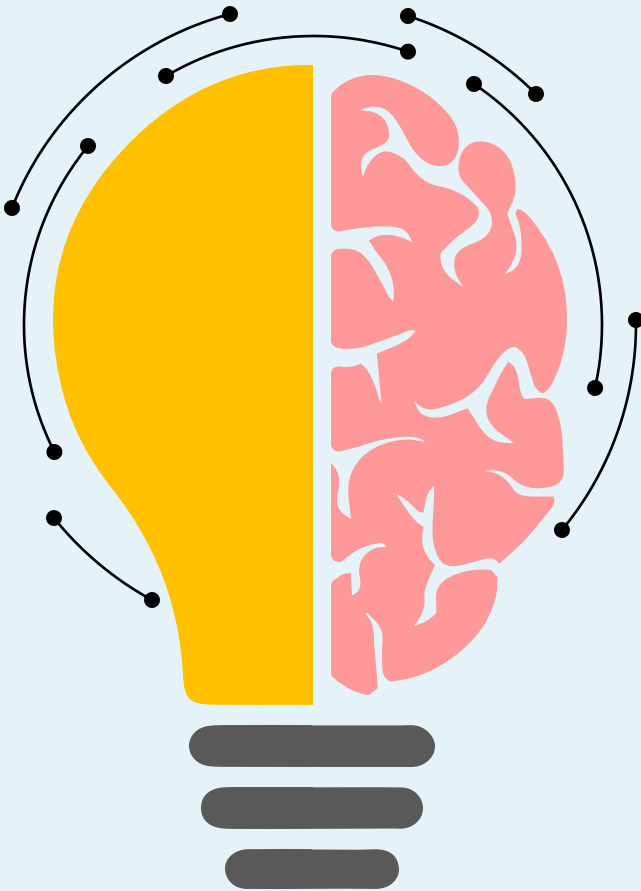


Contact Information



Reporting required information to VA is a crucial element of an SCO's job

Failure to report required information to VA could have negative impacts to your facility and students



Ensure your contact information is kept up-to-date with the VA

Not updating information could prevent VA from contacting your facility for clarification on enrollment

VA Form 22-8794



Designation of School Certifying Official(s)

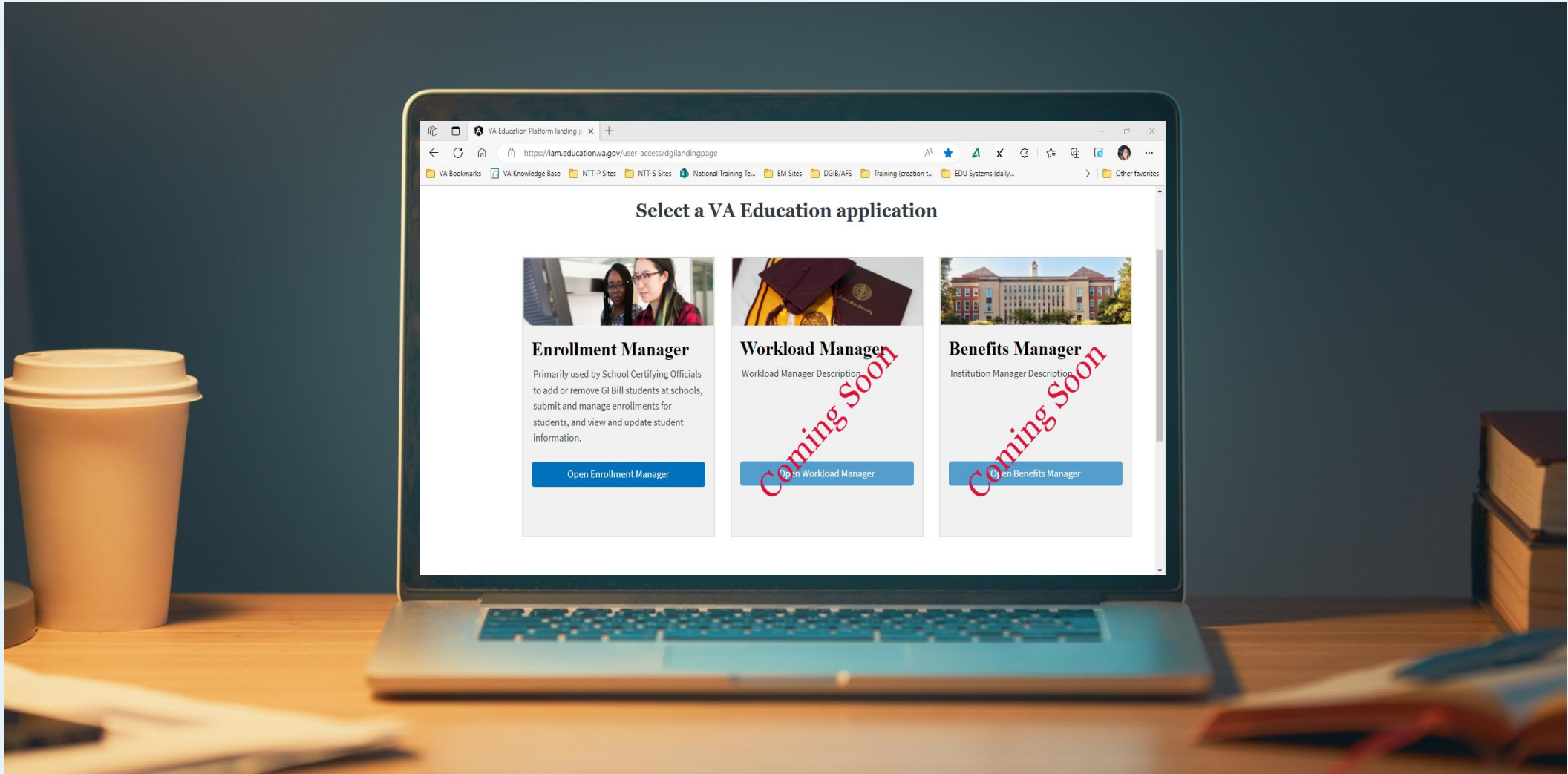
Include the names, titles, and signatures of all certifying officials, not just the changed information.

1. MUST ONLY be completed by a responsible official with the authority to designate certifying officials for the school or training establishment.

2. MUST be completed whenever there is a change in any of the information.

A new VA 22-8794 form will supersede all previously submitted forms.

Enrollment Manager (EM)



Certification: Submission



Non-33 Chapters

- ✓ Can be submitted 120 days before term
- ✓ Must be submitted within 30 days of the beginning of the term
(OR)
- ✓ If below circumstances apply, certification must be submitted on or after the first day of class and tuition and fees must be reported
 - Training is less than ½ time
 - Student is on active duty, or
 - Accelerated payment is requested

Chapter 33

- ✓ Submit certifications as early as possible
- ✓ Certifications must be submitted within 30 days of the beginning of the term

Certification: Public Law 116-315, Section 1010

EFFECTIVE
August 1, 2021

REQUIRES:

Initial enrollment certification for each Chapter 33 student

Subsequent enrollment certification (verification) after the school's drop-add period

The end of the drop-add period is the last day when a student can withdraw without consequence

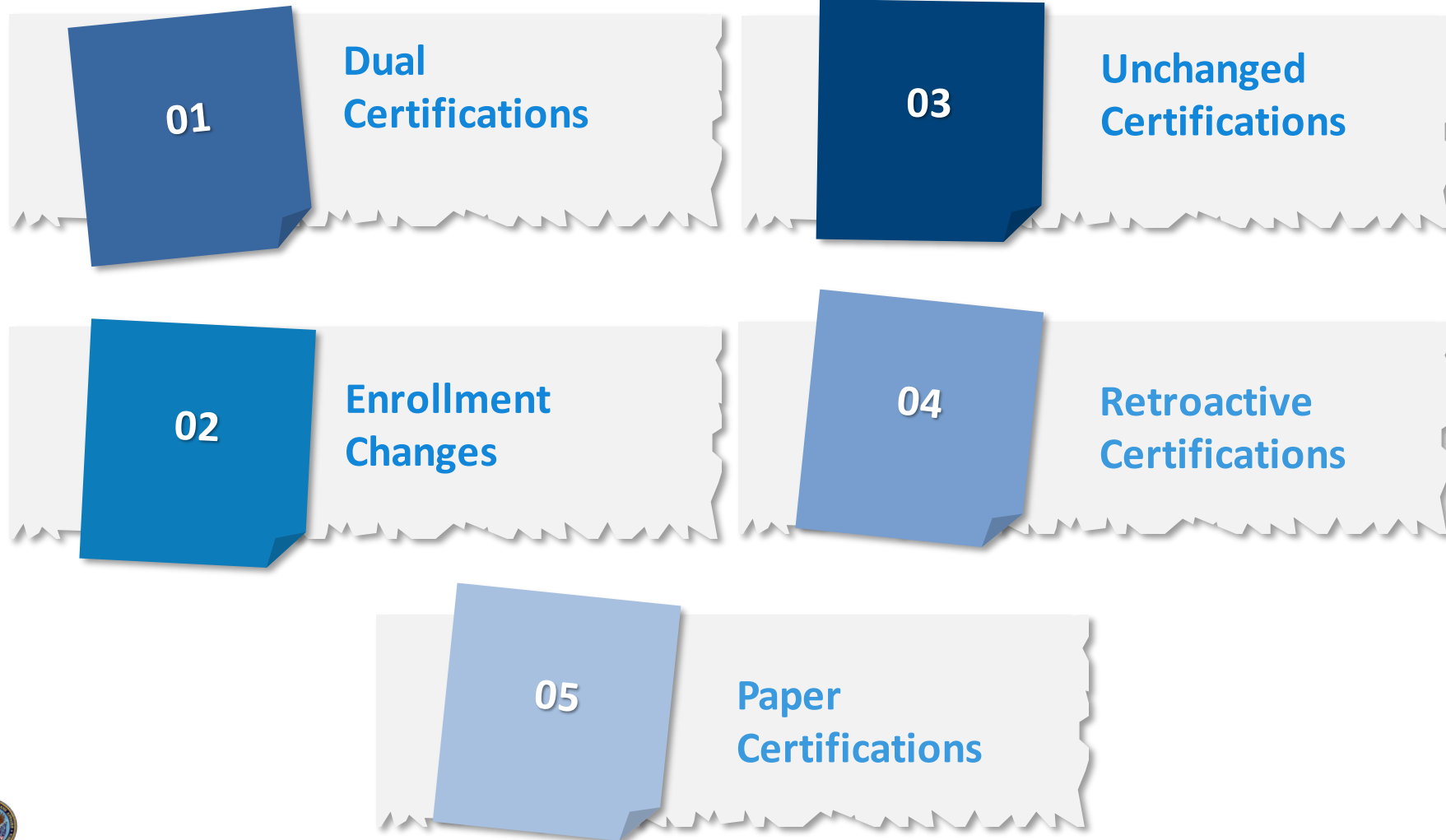
2nd certification must be received no later than 30 days after school's drop-add period or 60 days from the first day of enrollment

Schools without a drop-add period, 2nd certification must be received no sooner than 30 days and no more than 60 days from the first day of the enrollment

Section 1010: Second Certification



There are 5 accepted methods to satisfy the 2nd certification of the 1010 requirement:



Certification: Enrollment Periods



Quarter	10-13 weeks
Semester	15-19 weeks
Non-standard Term	longer or shorter than a standard semester or quarter
Vacation Period	7 or more consecutive days

Certification: Certifying Credit



Chapter 33:

SCOs must certify the number of credit hours the student takes that apply to the student's program.

The number of resident credits and online credits must be reported on the certification. When combined, they should equal the total credit taken for the term.



Chapter 30, 35, 1606:

SCOs must certify the number of credit hours the student takes each quarter, semester, or term.

Note: Resident credit and Online credit is reported separately for Chapter 33 only.

Certification: Certifying Tuition and Fees



Tuition and Fees

Tuition is the actual established charges for tuition the student is required to pay. Fees are mandatory charges applied by the school for pursuit of an approved program of education.



Chapter 33

SCOs must certify the Tuition and Fees charged to a student after deducting any tuition-only specific waivers, scholarships, aid, and assistance.



Chapters 30 and 35

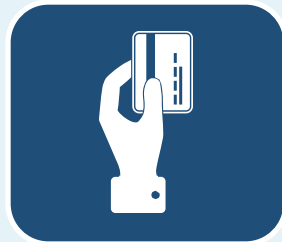
Tuition and Fees must be reported for enrollment periods when training time is less than $\frac{1}{2}$ time, when the student is on active duty, and when accelerated payment is requested.

Certification: Equity of Charges



Meaning

Your facility is obligated to charge VA students equitably with non-VA students required to pay for the same course



(Example 1)

Your facility cannot charge VA students a higher tuition and fees rate than non-VA students



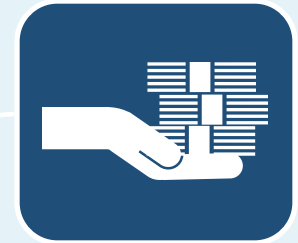
(Example 2)

Non-VA students cannot routinely get discounts, waivers, or need based scholarships, grants, etc., that are not similarly available to VA students



(Example 3)

Your facility cannot routinely write off debts if non-VA students do not make their payments



(Example 4)

Your facility cannot routinely offer extra time to non-VA students to pay their tuition and fees

Certification: Changes in Enrollment



When a student makes a change to an enrollment period after the initial certification has been submitted, the change should be reported as an Amendment.

Standards of Progress (SoP)



When a student has failed to maintain the prescribed SoP, VA must be informed promptly so benefit payments can be discontinued in accordance with the law.



Academic Probation

Schools are no longer required to report academic probation to VA.



Academic Suspension

When a student is suspended for failing to maintain the school's prescribed SoP, you must report this to VA as a termination.



Graduation

Schools are required to report graduation or program completion information to VA. The last date of the graduating term will be the date of termination.

Certification: VA as “Last Payer”



VA is the “Last Payer”.
This means your facility must apply tuition only specific waivers, scholarships, aid, and assistance before assessing charges to the VA.

Knowledge Check

The platform used to submit enrollment certifications to VA for students utilizing GI Bill benefits is called Enrollment Manager.



TRUE



FALSE

Knowledge Check

The platform used to submit enrollment certifications to VA for students utilizing GI Bill benefits is called Enrollment Manager.



TRUE

A stack of papers is shown on a light blue background. The top paper is pink and has the text "Compliance Surveys" written on it. Below it are several light-colored papers. To the left of the papers are three writing instruments: an orange Faber-Castell marker, a red Sharpie marker, and a silver pen with a red cap.

Compliance Surveys



Compliance Surveys

- Purpose
- Review of Records
- Retention of Records
- Best Practices



Purpose



Law Requires

Periodic Compliance Surveys be conducted at educational institutions.



During Survey

School and student records are reviewed to ensure compliance with applicable laws.



Purpose 1:

Ensure VA payments are based upon proper and correct enrollment information as furnished by the school to the VA.



Purpose 2:

Assist schools, training officials, and students in understanding the requirements of the law in order to prevent deficiencies or violation.

Review of Records



38 U.S.C. 3690(c)

Student records and accounts must be made available for review by authorized representatives of the government notwithstanding any other provision of the law

Buckley Amendment (PL 93-380)

Requires student consent to release information from student records.
Information sought in connection with an application for the receipt of financial aid is exempt.
School records relating to VA benefits fall into the “Financial Aid” category and are exempt from the provisions of this amendment.

Retention or Records



Student Records

Three (3) years from the termination of enrollment



Advertising

Preceding 12-month period



Best Practices



- Documents should be clearly labelled and arranged in files according to the VA beneficiary to be reviewed.
- Original documents should not be provided; certifying officials should provide copies of all documents requested.
- A certifying official or other school official should be available throughout the survey.
- Certifying official should provide a detailed map showing how to reach their office and all pertinent school procedures, prior to the survey.
- Certifying official should make certain all documentation requested is made available during the survey.
- Copies should be provided on standard letter sized paper (8.5 x 11 inches), printed on one-side, and free of staples.
- Certifying official should provide a legend for all codes (finance codes, course codes, etc.) and grades to the surveyor.

Knowledge Check

Records of an institution or establishment must be retained for a period of at least TEN YEARS following the termination of each period during which a VA beneficiary was enrolled.



TRUE



FALSE

Knowledge Check

Records of an institution or establishment must be retained for a period of at least TEN YEARS following the termination of each period during which a VA beneficiary was enrolled.



FALSE

Summary

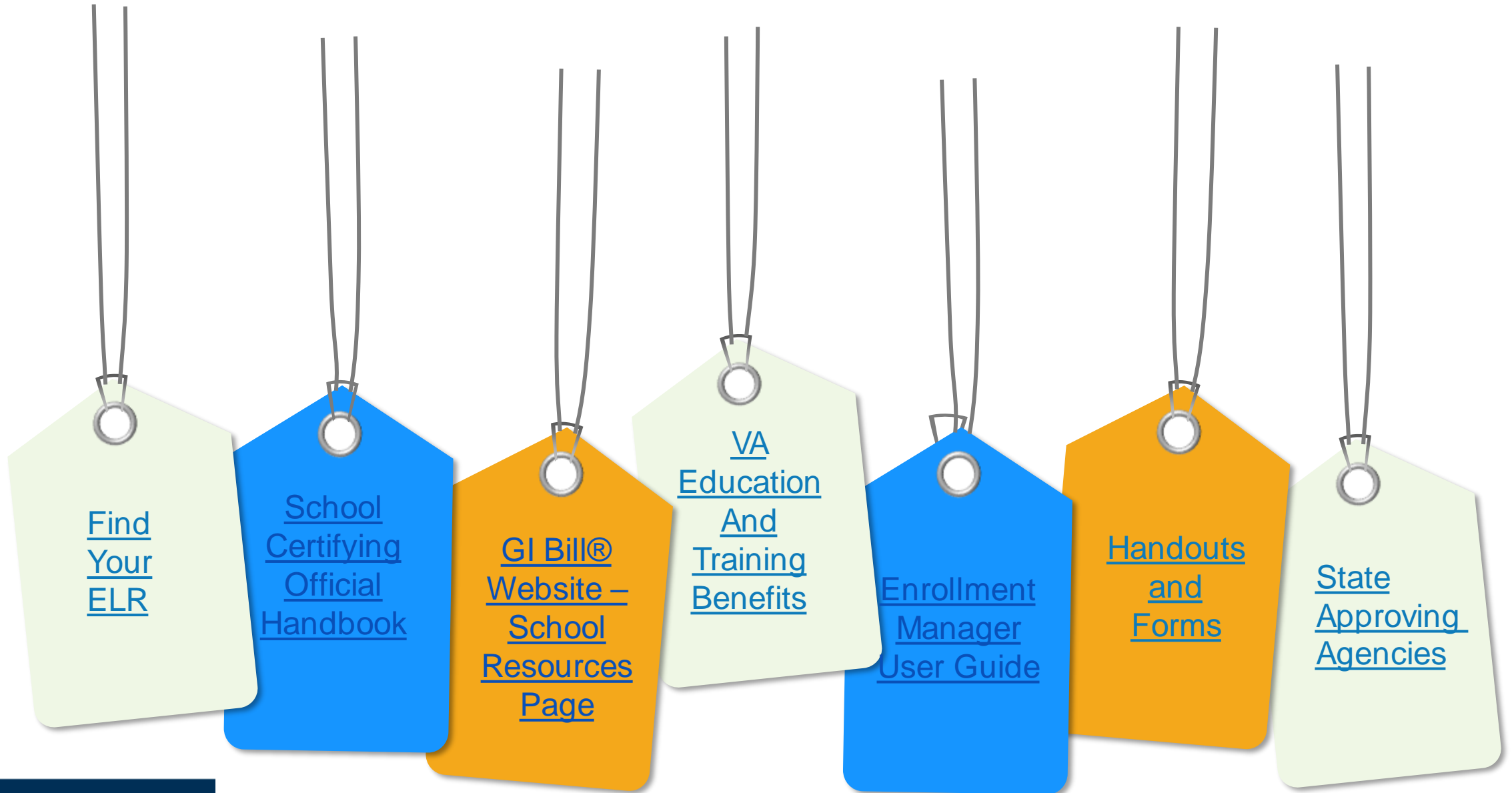


Apply current VA Rules and Policies to your role as a SCO

Report accurate, complete, and timely information to VA

Explain the SCO role in Compliance Surveys

CERTIFYING OFFICIAL RESOURCE LINKS



ADDITIONAL RESOURCES

Scan QR Code to
sign up for “SCO
in the Know”
emails



Stay up to date on VBA's
social platforms



[@GIBillEducation](#)



[@VAVetBenefits](#)



[@VABenefits](#)



Watch videos on VBA's
YouTube channel



[@VAVetBenefits](#)



U.S. Department
of Veterans Affairs

Public Law and CFR References



- [Public Law 116-315, Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020](#)
- [Public Law No: 115-407, Veterans Benefits and Transition Act of 2018](#)
- [Public Law No: 111-377, Post-9/11 Veterans Educational Assistance Improvements Act of 2010](#)
- [Public Law No: 115-48, Harry W. Colmery Veterans Educational Assistance Act of 2017](#)
- [Public Law No. 93-380, Buckley Amendment](#)
- [38 CFR 21.4259 - Suspension or disapproval](#)
- [38 CFR 3684 - Reporting Fees](#)
- [38 CFR 21.4200 – Definitions](#)
- [38 CFR 21.4203 – Report Requirements](#)
- [38 CFR 21.4201 – 85/15 Rule](#)
- [38 CFR 21.4209 - Examination of records](#)
- [38 CFR 21.9505 - 38 U. S. C chapter 33 Definitions](#)



Thank You!

