



Certification Process for Non-College Degree (NCD) Facilities



June 2023

Introduction



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Training Specialist



Would You Rather?

Drink your morning coffee hot or cold...

 Hot

 Cold

Be the teacher or the student...

 Teacher

 Student

Stay up late or get up early...

 Late

 Early

Overview

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



Learning Objectives



1

Discuss an overview of the Veterans Affairs (VA) Education Benefit processes

2

Describe the methods for measuring courses at an NCD facility

3

Explain the certification requirements for enrollments at an NCD facility

4

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

5

Summarize the intent of a Compliance Survey



Education Benefit Process



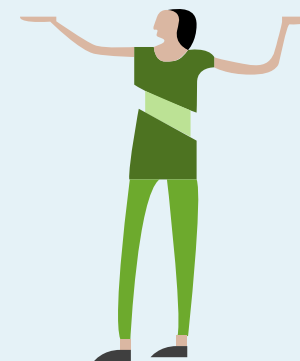
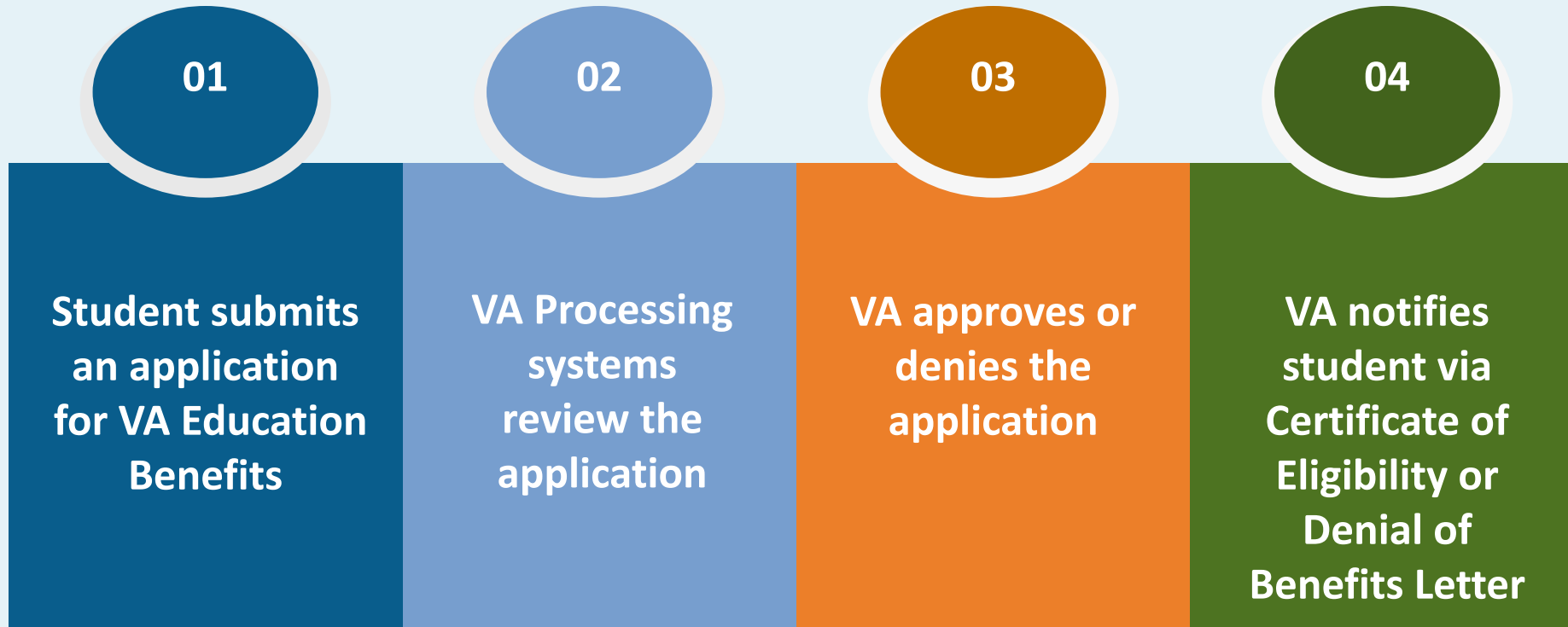


VA Education Benefit Process

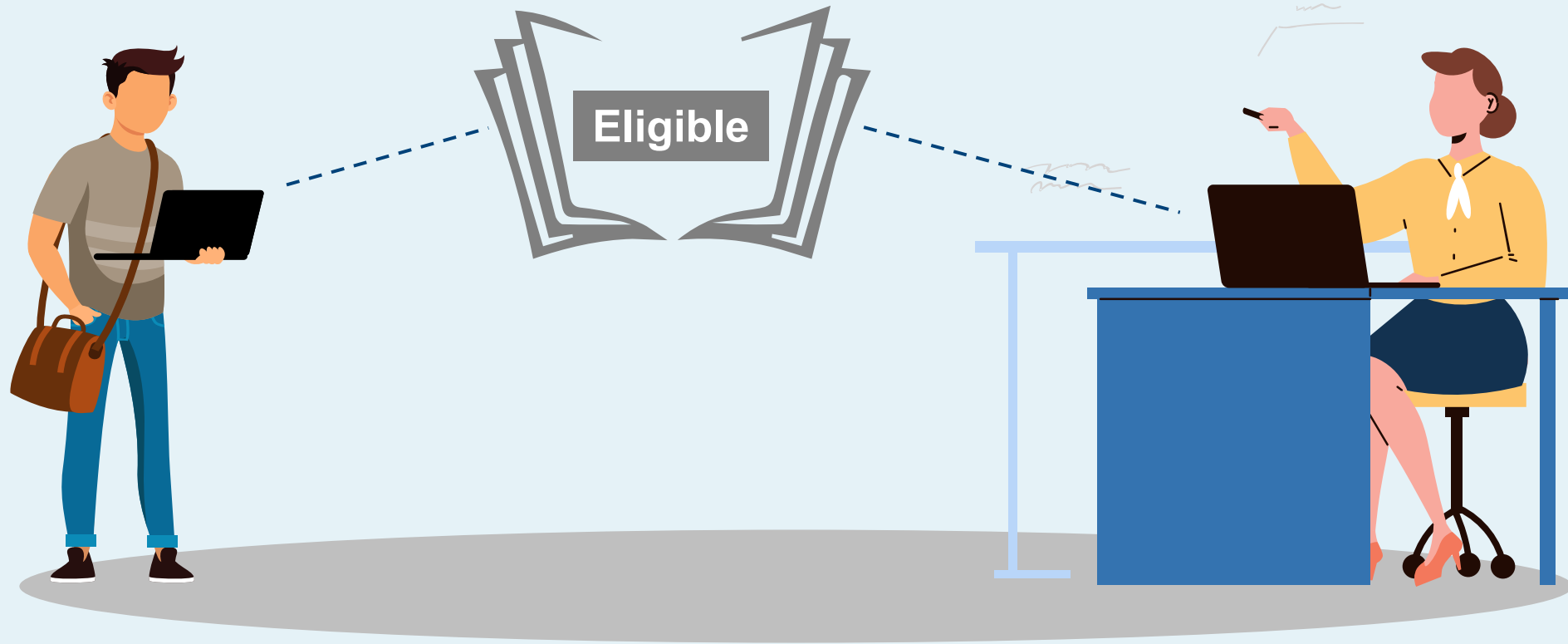
- Application for Benefits
- Certificate of Eligibility
- Enrollment Certification
- VA Payments



Application for Benefits



Certificate of Eligibility (COE)



Enrollment Certification



Student Enrollment Certification

Add UNDERGRAD enrollment

Enrollment information

Training facility (*Required)

Enrollment name

Fall 23

Fall 23: 08/14/2023 - 12/08/2023

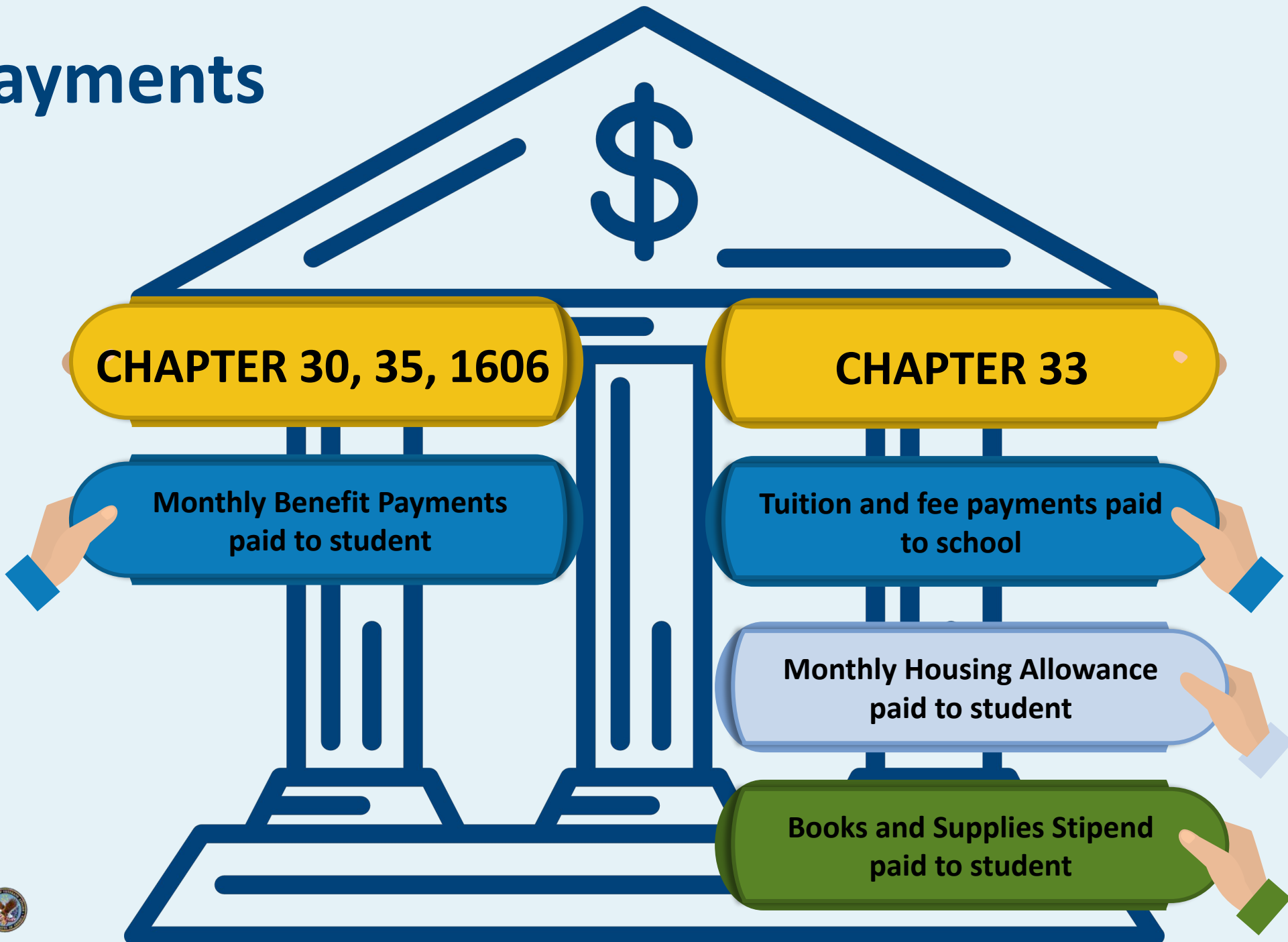
08/14/2023

End date (*Required)

12/08/2023

SUBMIT TO VA

VA Payments



Measurement of Courses





NCD Course Measurement

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



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



Beginning date, ending date, and number of clock hours a student is scheduled to attend each week must be reported

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



Online Clock hours at NCD facilities are not approved by VA



Rate of Pursuit (RoP)



Clock Hour Measurement (33)

Classroom Theory

- ▶ 18 + (Full Time) = 100%
- ▶ 17 = 90%
- ▶ 15 = 80%
- ▶ 13 = 70%
- ▶ 11 = 60%
- ▶ 09 = 50%

Shop Practice

- ▶ 22 + (Full Time) = 100%
- ▶ 20 = 90%
- ▶ 18 = 80%
- ▶ 15 = 70%
- ▶ 14 = 60%
- ▶ 11 = 50%

Divide schedule clock hours per week by full-time requirement (18 for CT; 22 for SP)
Anything above at or above 18 for CT and/or 22 for SP will result in 100% ROP

Training Time



Classroom Theory Predominates



- 18 hours or more = full-time
- 13-17 hours = $\frac{3}{4}$ time
- 9-12 hours = $\frac{1}{2}$ time
- 5-8 hours = $< \frac{1}{2}$ time
- 1-4 hours = $\frac{1}{4}$ time or less

OR

Shop/Practice Predominates



- 22 hours or more = full-time
- 16-21 hours = $\frac{3}{4}$ time
- 11-15 hours = $\frac{1}{2}$ time
- 6-10 hours = $< \frac{1}{2}$ time
- 1-5 hours = $\frac{1}{4}$ time or less

Knowledge Check #1

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



TRUE



FALSE

Knowledge Check #1

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



TRUE

Certification





NCD Certification Requirements

- VA Form 22-8794
- Enrollment Manager
- Enrollment Details
- Timeliness



VA Form 22-8794



Designation of School Certifying Official(s)

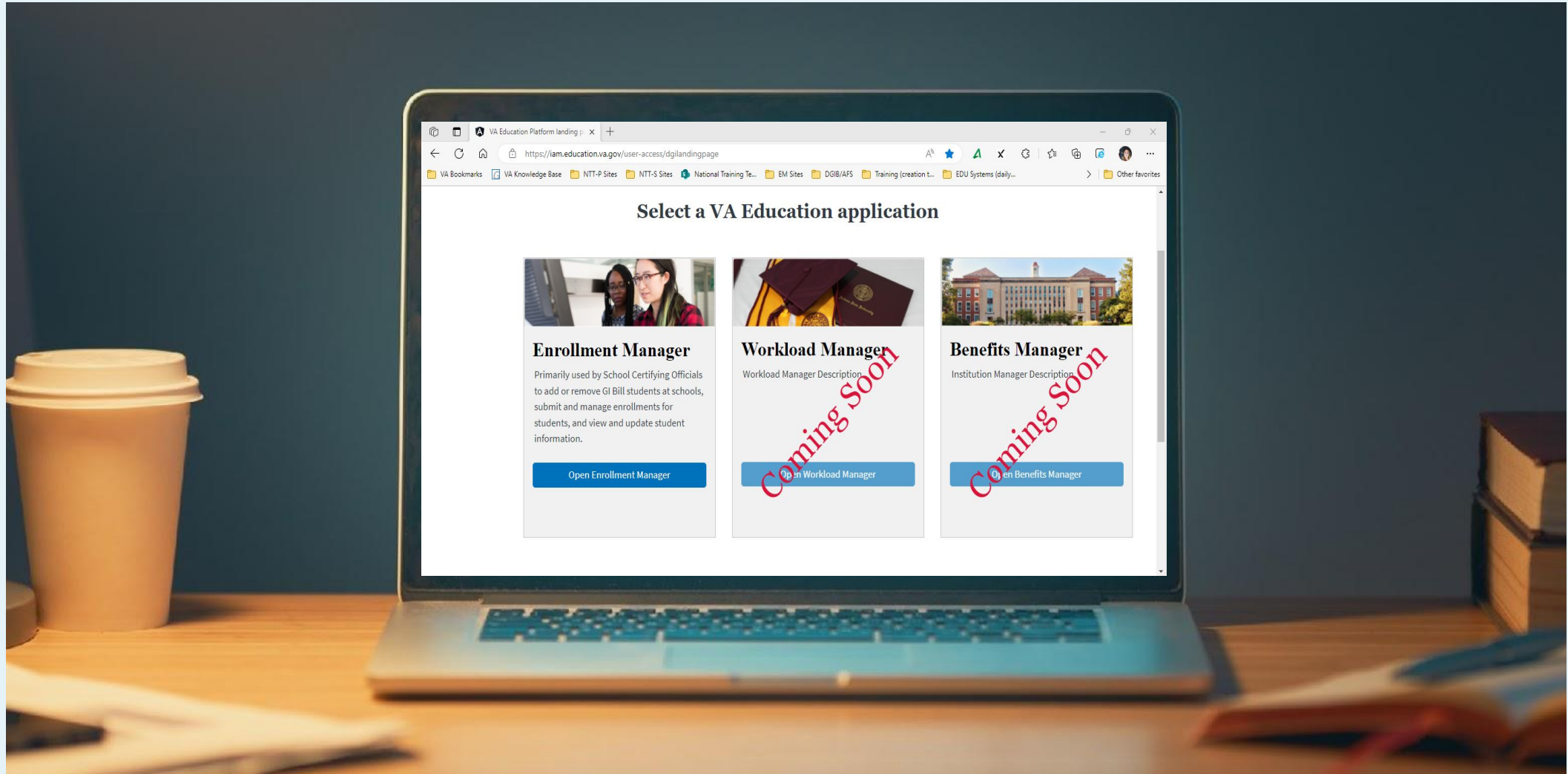
Include the names, titles, and signatures of all certifying officials, not just the changed information.

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)



Enrollment Details



Add UNDERGRAD enrollment

Enrollment information

Training facility (*Required)

Enrollment name

Begin date (*Required)

End date (*Required)

Vacation periods

What counts as a vacation period?

Vacation Period

Credits and tuition

Credit and Tuition: Requires one field have value greater than zero

Resident credits

Online credits

Clock hours

Remedial/Deficiency credits

Tuition & Fees amount (*Required)

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

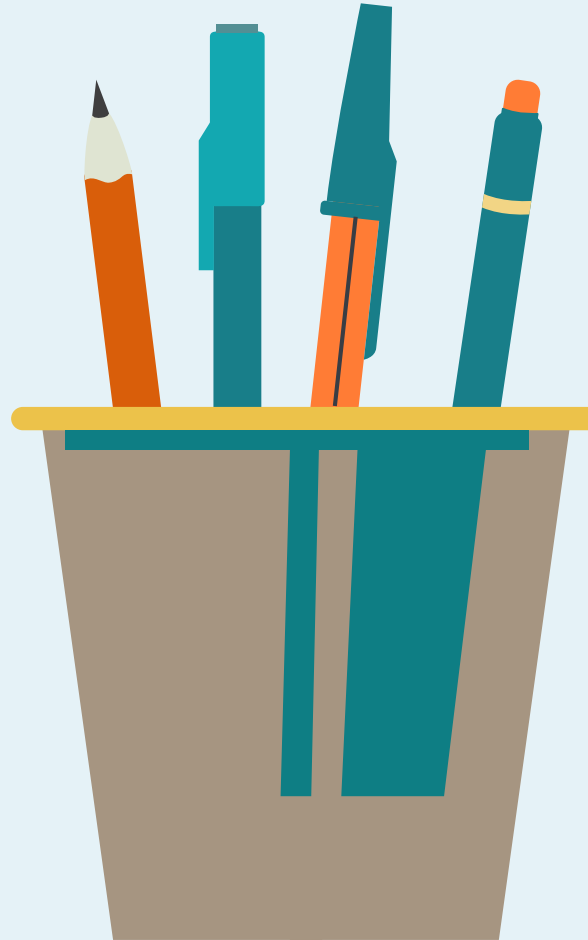
Certifying Credit



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.

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 ½ time, when the student is on active duty, and when accelerated payment is requested.

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.

Public Law 116-315, Section 1010



Effective
August 1, 2021

Public Law
(PL) 116-315,
Section 1010

Requires that schools submit an initial enrollment certification for each Chapter 33 student and a subsequent enrollment certification after the school's drop-add period.

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.

Timeliness



Chapters 30, 35, and 1606

Can be submitted 120 days before the term begins

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

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



Knowledge Check #2

Chapter 33 Enrollment Certifications must be submitted no later than 30 days after the start of the term or enrollment period.



TRUE



FALSE

Knowledge Check #2

Chapter 33 Enrollment Certifications must be submitted no later than 30 days after the start of the term or enrollment period.



TRUE

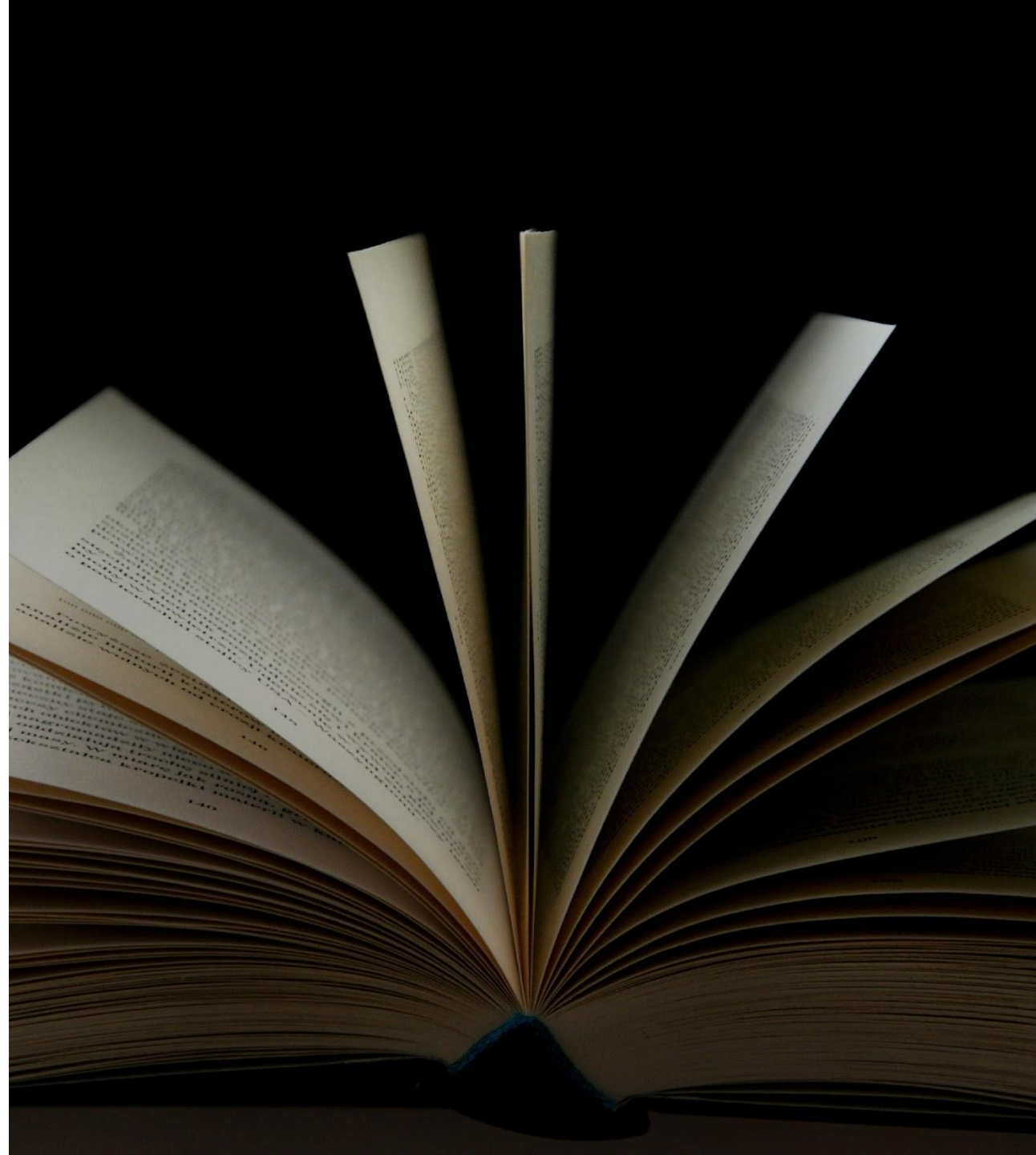
Policies





VA Guidelines and Certification Policies

- Standards of Progress (SoP)
- Attendance Standards
- Contracted Courses
- Prior Credit
- Length of Courses
- Equity of Charges
- VA as “Last Payer”
- Refund Policy
- Reporting Fees



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.

Attendance Standards



- ❑ Nonaccredited schools are required by federal law
- ❑ Must be stated in the school's catalog
- ❑ Must be enforced for GI Bill beneficiaries
- ❑ Instructor must verify each student's attendance



Contracted Courses



Must be

specifically approved

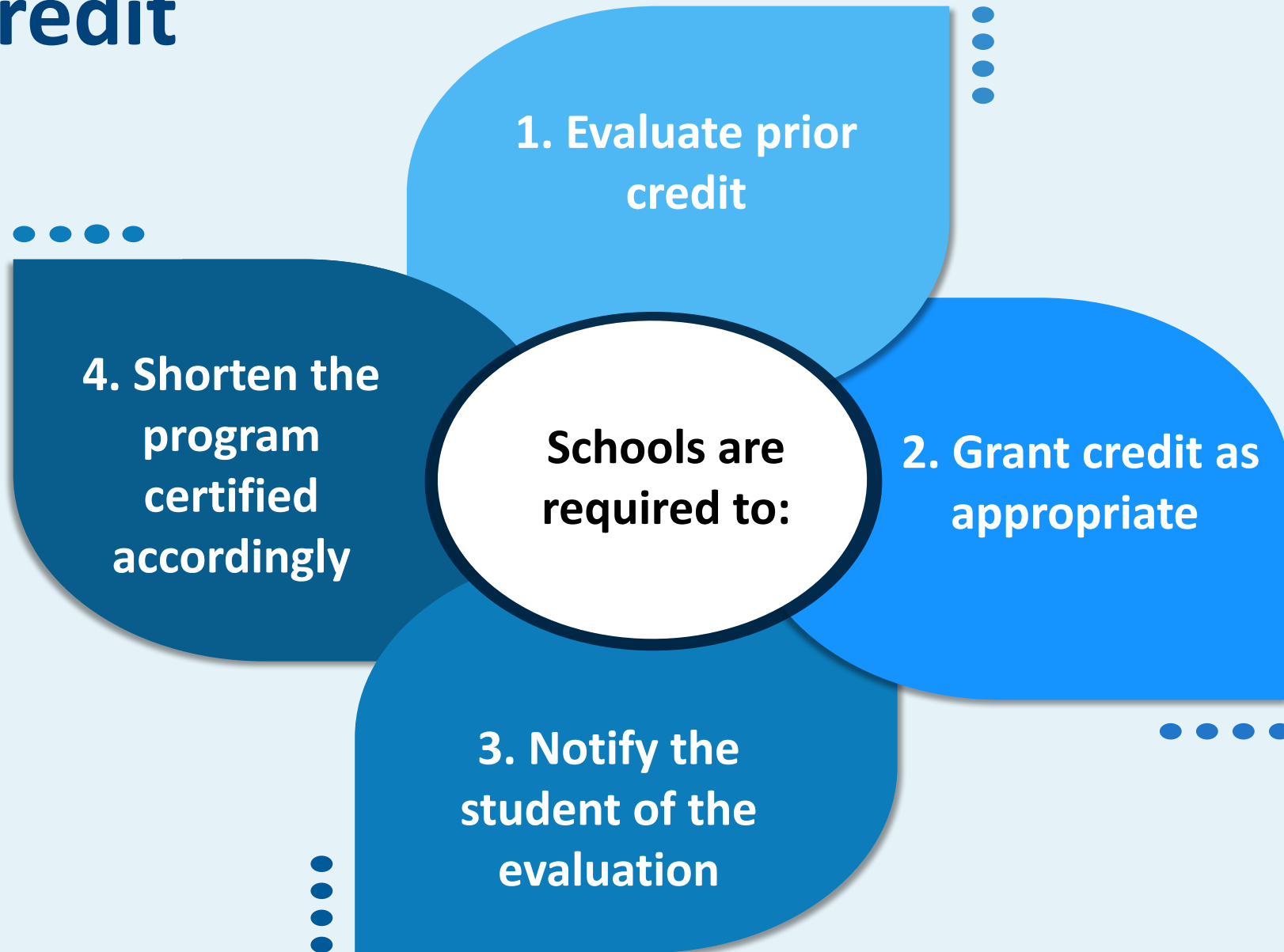
by the SAA

Example of a Contracted Course:



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

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

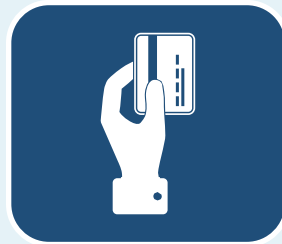


Certification: Equity of Charges



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



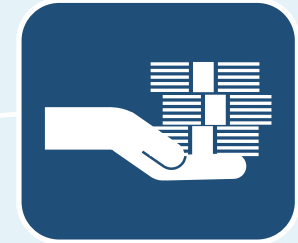
(Example 2)

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: 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.

Refund Policy



**Nonaccredited facilities
refund policies must
meet the minimum pro
rata requirements of 38
CFR 21.4255**



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.



Knowledge Check #3

Schools can certify a program for more hours than the SAA has approved.



TRUE



FALSE

Knowledge Check #3

Schools can certify a program for more hours than the SAA has approved.



FALSE

Knowledge Check #4

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 #4

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



**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

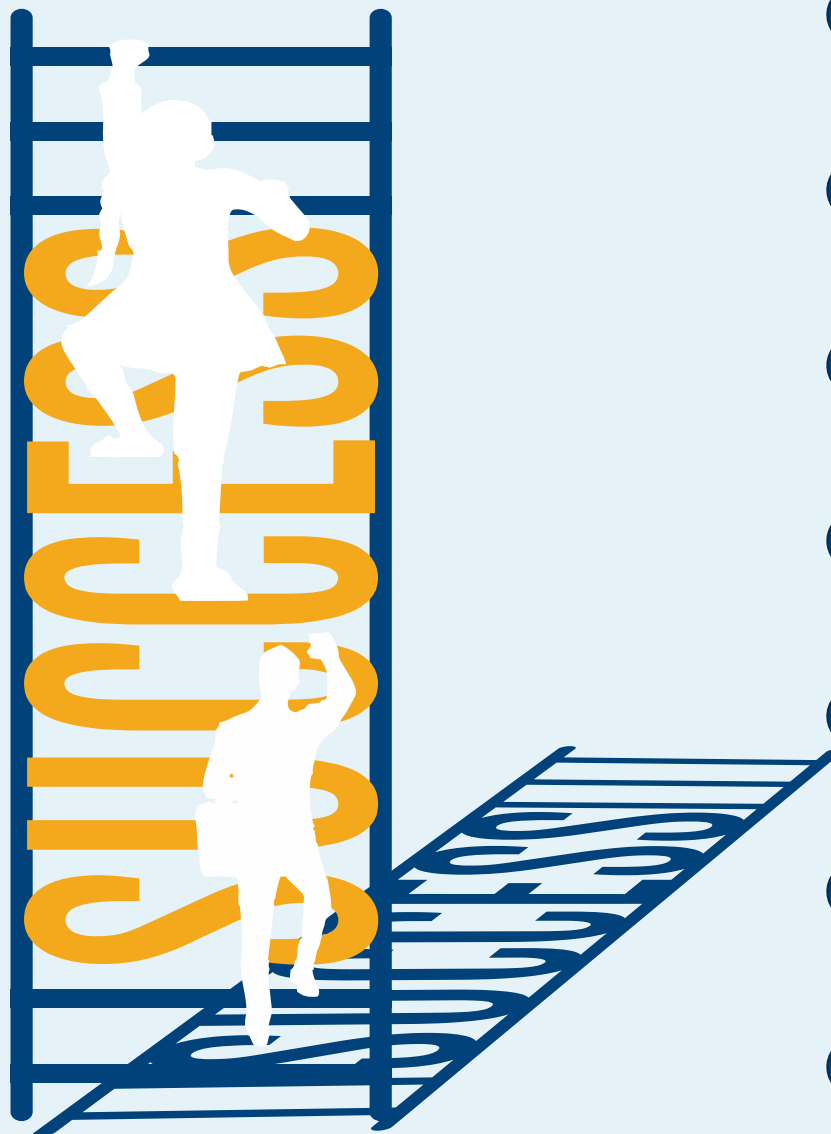


Advertising

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 #5

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 #5

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



1

Discuss an overview of the Veterans Affairs (VA) Education Benefit processes

2

Describe the methods for measuring courses at an NCD facility

3

Explain the certification requirements for enrollments at an NCD facility

4

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

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Summarize the intent of a Compliance Survey

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

Facebook icon: [@GIBillEducation](#)
Twitter icon: [@VAVetBenefits](#)
Instagram icon: [@VABenefits](#)

Watch videos on VBA’s YouTube channel



[@VAVetBenefits](#)



Public Law and CFR References



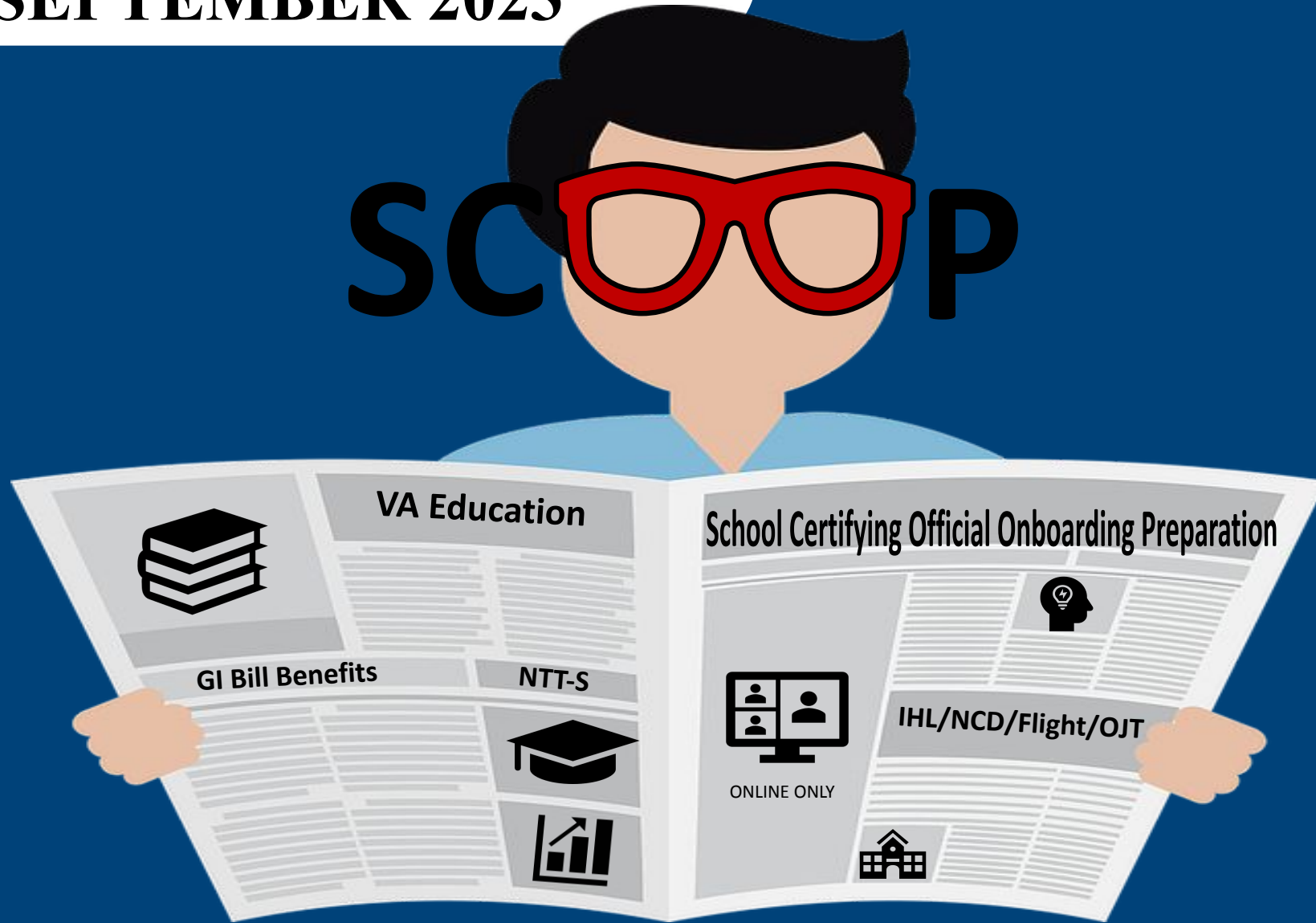
- [Public Law 116-315, Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020](#)
- [Public Law No: 111-377, Post-9/11 Veterans Educational Assistance Improvements Act of 2010](#)
- [Public Law No. 93-380, Buckley Amendment](#)
- [38 CFR 21.4259 - Suspension or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

Questions?

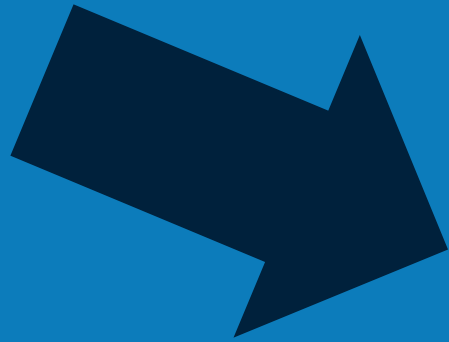


COMING SEPTEMBER 2023

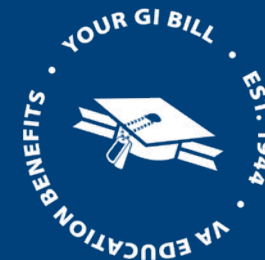
SCOOP



SURVEY



WAVES July 2023 - Certification Process for NCDs



Thank You!

