

# The Certification Process Part 2

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VETERANS BENEFITS ADMINISTRATION



U.S. Department  
of Veterans Affairs

# The Certification Process

## Part 2

### **TOPICS COVERED:**

Certifying Credit

Rate of Pursuit and Training Time

Supplemental and Concurrent Enrollments

Dual Majors, Minors, and Dual Objectives

Study Abroad

Certifying Tuition and Fees

# Certifying Credit

## Chapter 33

- Resident credit (Res)
- Distance learning credit (Dist)

Example:

Enroll Dates		Res	Dist	R/D	Clock	T&F
Begin	End	Hrs	Hrs	Hrs	Hrs	Amt
08/17/2015	12/11/2015	9	6	0	0	\$1,500.00
Remarks:						

# Certifying Credit

## Chapter 33- Undergraduate

Certify the number of credit hours the student takes that apply to his or her program.

VA will divide the number of credit hours certified by the number of credit hours required to be full-time to determine rate of pursuit.

Examples: If full-time is 12 credits, then rate of pursuit for:

6 credits (or credit equivalents) is 50% ( $6 \div 12 = 50\%$ )

7 credits (or credit equivalents) is 58% ( $7 \div 12 = 58\%$ )

*The rate of pursuit is rounded to the nearest 10<sup>th</sup> for the Basic Allowance for Housing.*

# Certifying Credit

## Chapter 33- Graduate

Enroll Dates		Res	Dist	R/D	Clock	T&F	YR	TT/FT=
Begin	End	Hrs	Hrs	Hrs	Hrs	Amt	Amt	
08/17/2015	12/11/2015	9	0	0	0	\$6,000.00		9
Remarks:								

Rectangular Snip

Enroll Dates		Res	Dist	R/D	Clock	T&F	YR	TT/FT=
Begin	End	Hrs	Hrs	Hrs	Hrs	Amt	Amt	
08/17/2015	10/13/2015	6	0	0	0	\$4,500.00		5
Remarks:								

# Certifying Credit

## Chapter 33- Graduate

### Example 1:

Enroll Dates		Res	Dist	R/D	Clock	T&F	YR	TT/FT=
Begin	End	Hrs	Hrs	Hrs	Hrs	Amt	Amt	
08/17/2015	12/11/2015	6	0	0	0	\$5,000.00		9
Remarks:								

(6 ÷ 9 equals .66). The student's rate of pursuit is 66%.

### Example 2:

Enroll Dates		Res	Dist	R/D	Clock	T&F	YR	TT/FT=
Begin	End	Hrs	Hrs	Hrs	Hrs	Amt	Amt	
01/17/2016	02/13/2016	3	0	0	0	\$2,500.00		3
Remarks:								

100% RoP, or full time, in this example.

# Certifying Credit

## Distance vs Residence vs Hybrid

### UNDERGRAD RESIDENT TRAINING

- Must have regularly scheduled classes & meet at least once every 2 weeks
- Total hrs of instruction (based on 50 minutes per hour) must  $\geq$  the # of credits awarded multiplied by the number of weeks in a term
  - 3cr over 16 week = 48 total hours in class
  - 3cr over 5 week = 15 total hours in class

\*And must meet at least once every 2 weeks
- **“In class” does not mean the student is in class working independently at his or her own pace with a teacher in the room to answer questions**

### Graduate resident training

- Consists of 2 regularly scheduled standard classes per term, research (on or off campus), or a combination of both.

### Independent Study, Online, Distance Ed

- **These are all treated the same by VA**
- interaction between the student and the instructor (who is physically separated from the student) through the use of communications technology instead of regularly scheduled, conventional classroom or laboratory sessions.
- Communications technology includes (but is not limited to):
  - Open Circuit TV
  - Computer technology
  - Wireless communication devices
- Any course, including “hybrid” or “blended” that does not meet the requirements for resident training is distance learning.

# Certifying Credit Distance vs Residence vs Hybrid

- Remedial/deficiency courses offered in a hybrid format cannot be certified unless they meet the definition for resident training.
- Non-accredited schools cannot certify distance learning/independent study courses. Courses offered in whole or in part by independent study cannot be approved at non-accredited schools.
- Schools with multiple branches should not cert online classes that are administered/hosted out of a different branch.



# Rate of Pursuit and Training Time

"Course measurement" refers to the determination of the student's Rate of Pursuit (RoP) or training time (full time, 3/4 time, 1/2 time, etc.). Rate of Pursuit or Training Time is used to determine the rate of payment.

## Chapter 33

Rate of Pursuit

## Chapter 30, 35, 1606, 1607

Training Time

# Rate of Pursuit and Training Time

## Training Time (Chapter 30, 35, 1606, 1607)

### Training Time – Undergraduate (Chapters 30, 35, 1606, and 1607)

#### Standard Quarter or Semesters

#### Training Time

<b>If the student is enrolled in:</b>	<b>The Training Time is:</b>
12 or more credit hours	Full time
9 through 11 credit hours	3/4 time
6 through 9 credit hours	1/2 time
4 through 5 credit hours	*Less than 1/2 time; more than 1/4 time
1 through 3 credit hours	*1/4 time or less

# Rate of Pursuit and Training Time Undergraduate versus Graduate Students

## **Undergraduate**

Measured by VA in accordance with 38 CFR 21.4272.

## **Graduate**

Schools may qualify to make their own determination of training time for graduate and advanced professional courses based upon its published standards for all graduate students.

### Certifying Credit (Chapters 30, 35, 1606, and 1607) - Graduate

Enter the training time (full,  $\frac{3}{4}$ , etc.) in the TT/FT box for the enrollment period based on your school's academic policy. The institution determines what is considered full-time.

# Rate of Pursuit and Training Time

## Non-Standard Terms & Credit Hour Equivalent (CHE)

- VA converts credit earned during nonstandard quarters or semesters to equivalent credit hours. VA makes the conversion, not schools. Schools must report actual credit. Refer to credit hour equivalency tables. The formula for converting quarters or semesters to credit equivalents is the same, except for the multiplier.

# Rate of Pursuit and Training Time

## Non-Standard Terms & Equivalent Credit Hours

If the term does not fit the standard lengths of Semester (15 – 19 weeks) or Quarter (10-13 weeks), the term is “non-standard” and the VA must calculate the "equivalent credit hours":

- **Semester** System: 18 x # of hours divided by the rounded number of weeks in the term (drop the decimals).
- **Quarter** System: 12 x # of hours divided by the rounded number of weeks in the term (drop the decimals).

# Rate of Pursuit and Training Time

## How to Measure Nonstandard Terms

### EXAMPLE:

Enroll Dates		Res	Dist	R/D	Clock	T&F
Begin	End	Hrs	Hrs	Hrs	Hrs	Amt
07/13/2016	08/18/2016	3	0	0	0	\$1,500.00
Remarks:						

A term extends from July 13 to August 18. This term is 37 days long or 5 weeks and 2 days. Disregard the remainder of 2 days. The term is considered 5 weeks for the purpose of computing "equivalent credit hours."

# Rate of Pursuit and Training Time

## How to Measure Nonstandard Terms

### Example:

Enroll Dates		Res	Dist	R/D	Clock	T&F
Begin	End	Hrs	Hrs	Hrs	Hrs	Amt
08/17/2015	10/13/2015	4	0	0	0	\$800.00
Remarks:						

A student is taking a 4 semester-hour course that lasts 8 weeks. Twelve credit hours is full time at this school. Compute "equivalent credit hours" as follows:

$$(4 \times 18) / 8 = 9$$

3/4-time training (based on 9 "equivalent credit hours")

# Rate of Pursuit and Training Time Equivalent Semester Hours

TERM LENGTH HOURS PURSUED	14	13	12	11	10	9	8	7	6	5	4	3
10	12.9	-	-	-	-	-	-	-	-	-	-	-
9	11.6	12.5	-	-	-	-	-	-	-	-	-	-
8	10.3	11.1	12	13.1	-	-	-	-	-	-	-	-
7	9	9.7	10.5	11.5	12.6	-	-	-	-	-	-	-
6	7.7	8.3	9	9.8	10.8	12	13.5	-	-	-	-	-
5	6.4	6.9	7.5	8.2	9	10	11.2	12.9	-	-	-	-
4	5.1	5.5	6	6.5	7.2	8	9	10.3	12	14.4	-	-
3	3.9	4.2	4.5	4.9	5.4	6	6.7	7.7	9	10.8	13.5	-
2	2.6	2.8	3	3.3	3.6	4	4.5	5.1	6	7.2	9	12
1	1.3	1.4	1.5	1.6	1.8	2	2.3	2.6	3	3.6	4.5	6



# Rate of Pursuit and Training Time Equivalent Quarter Hours

TERM LENGTH HOURS PURSUED	9	8	7	6	5	4	3	2	1
9	12	-	-	-	-	-	-	-	-
8	10.7	12	-	-	-	-	-	-	-
7	9.3	10.5	12	-	-	-	-	-	-
6	8	9	10.3	12	-	-	-	-	-
5	6.7	7.5	8.6	10	12	-	-	-	-
4	5.3	6	6.9	8	9.6	12	-	-	-
3	4	4.5	5.1	6	7.2	9	12	-	-
2	2.7	3	3.4	4	4.8	6	8	12	-
1	1.3	1.5	1.7	2	2.4	3	4	6	12

# Rate of Pursuit and Training Time

## Undergraduate - Rate of Pursuit (Chapter 33)

- VA calculates rate of pursuit by dividing the credit hours (or credit hour equivalents) being pursued by the number of credit considered to be full-time by the school. The resulting percentage is the student's rate of pursuit.

Enroll Dates Begin	End	Res Hrs	Dist Hrs	R/D Hrs	Clock Hrs	T&F Amt
08/17/2015	10/13/2015	4	0	0	0	\$800.00
Remarks:						

$$(4 \times 18) / 8 = 9 \quad \text{CHE} = 9$$

$$9 / 12 = 75\% \text{ (rounded to the nearest } 10^{\text{th}}) \quad \text{RoP} = 80\%$$

# Supplemental and Concurrent Enrollments

CERTIFICATION OF NONMATRICULATED or GUEST STUDENT			
1. Name of Student: _____			
VA File Number of Student: _____			
2. Name of Degree-Granting School: _____			
School Address: _____			
_____			
3. Student's current or intended program: _____			
4. <b>CERTIFICATION</b>			
I certify that the above-named student:			
a. Has applied for admission to this school or is currently a degree-seeking student at this school;			
b. This student has permission to take the unit courses listed below at the school listed below;			
c. These unit subjects will transfer to our school and apply in-full to the requirements for this student's degree at our school or apply to pre-requisite requirements for subjects needed in this student's degree at our school.			
Name and address of school _____			
where subjects are to be _____			
taken (supplemental _____			
school): _____			
Subject courses to be taken:			
Course Title	Course Code	Course Title	Course Code
_____	_____	_____	_____
_____	_____	_____	_____
Signature & Title of Certifying Official		Date	

# Dual Majors and Minors

## Dual Major

- Dual majors pursued under an academic policy that defines the dual major's requirements can be certified if both majors are approved. Only courses required to complete the dual major can be certified. During VA site visits, or during compliance surveys, if VA reviews a case for a student who is pursuing dual majors, we should ensure the student is not enrolled in courses outside either major and that the courses are approved.

## Minor

- A minor pursued as part of an approved major can be certified, even if the minor will require additional credit to graduate. Only courses required to complete the degree, including the minor, can be certified.

# Dual Objectives

## Dual Objectives

- Concurrently pursue two different degrees or pursue a degree and a certificate. All objectives pursued are generally recognized as being reasonably related to a single career field.

**Florida SAA** *does not approve specific dual objectives. Instead, the facility needs to thoroughly document how the dual objectives relate to the same career field. The documentation needs to be maintained in the beneficiary's file for compliance survey purposes.*



## Study Abroad

- VA could not pay for any fees specifically due to participation in the study abroad program unless study abroad modality was mandatory for the specific degree. For schools that charge a comprehensive fee that includes the home school's tuition, they would have to itemize the fee and report the charged tuition.
- Students must be enrolled in courses that will apply to their program.
- Schools cannot report any of the following costs:
  - Transportation
  - Housing
  - Amenities fees or host school fees
  - Food

# Yellow Ribbon Program

## Yellow Ribbon Program



# Certifying Tuition and Fees (Chapter 33)

## **Tuition**

Tuition is the actual established charges for tuition the student is required to pay. Tuition is defined in the school's catalog or supplement and listed as tuition on the school's billing statement or invoice.

- **U.S. IHL Public Schools:** The actual net cost for in-state tuition and fees.
- **U.S. IHL Private and Foreign Schools:** The lesser of the actual net cost for tuition and fees or **\$21,970.46** beginning **August 1, 2016**.



# Out-of-State Waiver Policies and Procedures

Section 702 of Choice Act  
and  
2015 Florida Statute, Title XLVIII, Chapter 1009



# Certifying Tuition and Fees (Chapter 33)

**Examples of payments/waivers that you deduct include but are not limited to:**



- » [Florida](#) Purple Heart Waiver
- » Military Tuition Assistance
- » Employer payments or Private scholarships paid directly to the school specifically for tuition and fees
- » ROTC Scholarship
- » (MyCAA)
- » (HPSP)
- » (GETA)
- » [FRAG](#)
- » (ABLE)

# Certifying Tuition and Fees (Chapter 33)

**Examples of payments/waivers that you do not deduct include but are not limited to:**



- » [Florida](#) Bright Futures Scholarship
- » [Florida](#) Pre-Paid Tuition
- » [Florida](#) Student Assistance Grant (FSAG)

# 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.

# Certifying Tuition and Fees (Chapter 33)

## Validity of Fees

**Title 38 CFR 21.9505 defines Fees as:** *Fees* means any mandatory charges (other than tuition, room, and board) that are applied by the institution of higher learning for pursuit of an approved program of education. Fees include, but are not limited to, health premiums, freshman fees, graduation fees, and lab fees. Fees do not include those charged for a study abroad course(s) unless the course(s) is a mandatory requirement for completion of the approved program of education. (Authority: 38 U.S.C. 501(a), 3323(c))

**The key word in this definition is “mandatory”. We define that quite strictly and all that follows is based upon strict interpretation of that definition.**

# Certifying Tuition and Fees (Chapter 33)

## **Validity of Fees (Chapter 33)**

Validity of Fees –Before a fee can be certified to VA it must meet all of the requirements stated below:

1. Be listed in the school's approved catalog as a fee;
2. Be listed on the student invoice/payment ledger as a fee;
3. Be listed in the enrollment agreement/contract between the student and school as a fee; and
4. Be "mandatory" or otherwise "required"

The key provision above is the enrollment agreement because it is the binding legal agreement between the school and student with regard to the terms of enrollment, enrollment costs, etc. The catalog and ledgers may be amended, but once signed, enrollment agreements generally cannot. In those cases where the school and student do not sign a contract or enrollment agreement, then provisions 1, 2, and 4 above apply and must still be met.

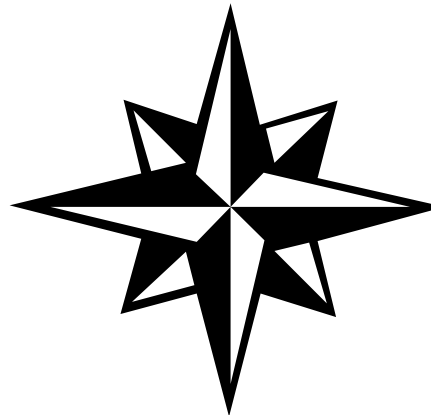
# Certifying Tuition and Fees (Chapter 33)

## Validity of Fees (Chapter 33)

**Books** – Because VA pays a book stipend to chapter 33 students, it should be very rare that a school will be allowed to certify a book fee to VA. If the book fee is required for all students regardless of circumstances, the school can certify a book fee to VA.

**Supplies** – Although the book stipend also includes supplies, if a school requires all students to pay a supply fee, then they may certify that fee to VA for reimbursement even if such supplies may be obtained from other sources. Once again, if the supply fee is not mandatory and is a convenience for the students, the school may not certify that fee to VA.

# QUESTIONS?



This PowerPoint presentation was created by Cynthia Kujawski, Supervisory ELR, May 2015. Last revised March 2016.