Q) IHL SCO education enrollments – S.3503 Enacted: What impact does the enactment of this Senate Bill have on Institutions of Higher Learning (IHL)?

A. Based on recently passed legislation (Senate Bill 3503, signed into law March 21, 2020), an IHL which converts an approved residence training modality course to an online training modality for that course (distance learning), should not submit changes when the conversion is the only factor. The law only authorizes this special authority from March 1, 2020, to December 21, 2020.

- Educational institutions which convert modalities as described above do not need to submit enrollment adjustments for the current term.
- Only converted courses – SCOs cannot certify resident credit hours to VA for online courses when there is no approval for a resident training counterpart.
- The new law applies equally to current and new students enrolled in the converted courses.
- In order to avoid confusion and the need to make multiple changes to enrollments, VA is asking all schools to temporarily refrain from making any future enrollment certifications (not already submitted in VA ONCE) if training has changed due to COVID-19. VA will provide further guidance as soon as possible.

Q) Post 9/11 GI Bill Beneficiary – Monthly Housing Payments: What happens when a modality changes for enrollment terms due to COVID-19?

A. Based on the new law, Post 9/11 GI Bill students who pursue resident courses converted to an online modality solely due to COVID-19 will continue to receive the Monthly Housing Allowance (MHA) rate for resident training. The law only authorizes this special authority from March 1, 2020, to December 21, 2020.

- Note: other types of changes to the student’s enrollment status may affect payments. Non COVID-19 related changes must still be reported per normal requirements.

Q) Educational Institutions – Post 9/11 GI Bill Tuition and Fee Payments: Will there be any impact on tuition and fee payments when only the modality changes within a term due to COVID-19?

A. Tuition and Fees reporting requirements will not change due to COVID-19 national emergency, nor will VA’s rules for benefit payments.

- Note: All standard adjustments and amendments still apply to non-COVID-19 circumstances.
Q) IHL temporarily ceases operations – discontinues training of all students: If an educational institution temporarily ceases operations due to COVID-19, what steps should the school take?

A. If the educational institution has temporarily ceased operations for all programs and students due to COVID-19, affected students will continue to receive their MHA until the end of the term or 4 weeks (28 days) from the date that the IHL temporarily ceased operations.

When this occurs, the IHL should not submit enrollment adjustments for the current term. However, the SCO must report all affected facility codes and the date(s) of temporary cessation of operations to their Education Liaison Representative (ELR) and State Approving Agency (SAA) AS SOON AS POSSIBLE. It is important to notify the ELR and SAA as soon as practical, so the claimant’s monthly stipend is correctly adjusted.

Q) IHL discontinues training in select programs: If a school transitions from resident to online classes to continue the training of some students, but must discontinue training in select programs affecting some students, what steps should the school take?

A. If the educational institution remains partially open (continues to provide training to some students) but must discontinue training to students enrolled in select programs or individual classes, the school must report changes for the students whose training is stopped. Current law only provides protection for stoppage in training when the school ceases operations completely (temporary or permanent).

- The SCO must report the date that training ceased. When reporting this change using VA ONCE, the SCO should select the standard remark “COVID 19” as the reason for the cessation of the training. If using the paper VA Form 22-1999b, a termination is reported, the SCO should include “COVID-19” in the remarks section.

Q) If a student becomes ill due to COVID-19 and cannot continue training while the educational institution continues to offer course training, what steps need to take place?

A. Depending on the length of the illness, the SCO should review the attendance and “Incomplete Grade” policy.

The SCO should report the withdrawal based on the attendance policy and report COVID-19 as mitigating circumstances. The student’s last day of attendance should be reported as the effective date. In these situations, the law does NOT allow VA to continue payments beyond the last day of attendance.