

## **COVID-19 SCO FAQs MARCH 24, 2020**

### **COVID-19: IHL SCO FAQs (includes foreign IHLs)**

#### **Q1) 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.

#### **Q2) 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.

#### **Q3) 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.

**Q4) VA education students – Remedial/Deficiency class: Will VA education students be allowed to continue or start remedial/deficiency level courses at Institutions of Higher Learning (IHL) who convert to an online modality due to COVID-19?**

A. Based on the new law, an approved educational institution which converts an approved resident Remedial/Deficiency course to an online training modality for that course (distance learning), may continue to certify those credit hours to the VA as resident credit hours during the authorized timeframe: March 1, 2020, to December 21, 2020.

**Q5) If an educational institution creates a new vacation break, or extends such a break, which may include a change in term dates that are due to COVID-19, what steps should the SCO take?**

A. The SCO handbook states to always include inclusive dates of official school vacation periods of 7 or more consecutive days when certifying non-standard enrollment periods for all benefits in non-standard remarks. However, do not report vacation periods on standard length terms. This remains true during this COVID-19 national emergency.

The only reporting requirement for a vacation break due to COVID-19 is if the IHL extends vacation break and also extends the end date of the term.

- Specific instructions for amendment reporting are in the SCO handbook.
- Standard and Non-standard term lengths are identified in the SCO handbook.

**Q6) IHL temporarily ceases operations – discontinues training of all students: If an educational institution temporarily ceases operation 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.

**Q7) 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.

**Q8) 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.

**Q9) If a student is enrolled in a standard IHL degree program involving flight training and the school ceases the flight training due to COVID-19, what steps should the SCO take?**

A. The SCO should review the “Incomplete Grade” policy and apply that procedure if applicable. When the training can continue, the student should complete the flight lab portion without any further reporting requirements to the VA.

Note: The student should not be enrolled in the subsequent flight course until the “I” grade is completed in accordance with the school’s policy.

If the school’s “Incomplete Grade” policy is not applicable, the SCO should report withdrawal from the flight lab based on the student’s last date of attendance. The SCO should report COVID-19 as mitigating circumstances.

## COVID-19: NCD SCO FAQs

**Q1) With the enactment of S.3503 on March 19, 2020, signed into law on March 21, 2020, can a Non-College Degree (NCD) education or training institute offer programs that were not previously approved by the State Approving Agency (SAA)?**

A. No, only programs previously approved by the SAA will be available for NCD institutions to continue enrollments of GI Bill students.

**Q2) What happens when an approved program at an NCD education or training institution temporarily ceases resident training and has the capability to convert training to an online modality during the COVID-19 national emergency?**

A. An NCD with a current SAA approved program may continue to train and report enrollments to the VA. Those students who pursue courses converted to an online modality solely due to COVID-19 will continue to receive the MHA rate for resident training. The law only authorizes this special authority from March 1, 2020, to December 21, 2020.

- SCOs should not report modality changes due to COVID-19 for any current enrollments submitted to VA.
- 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.
- 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.

**Q3) What happens when an NCD training institution temporarily ceases operations due to COVID-19 and cannot offer a program via online modality?**

A. When this occurs, the NCD should not submit enrollment adjustments for the current term. However, the SCO must report the temporary school closure to the 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.

- The school should refund payments per the approved policy as soon as possible.
- If the educational institution has temporarily ceased operations to all students due to COVID-19, affected students will continue to receive their MHA until the sooner of the end of the term or 4 weeks (28 days) from the date that the NCD temporarily ceased operations.

**Q4) What happens when an NCD vocational flight training institution temporarily ceases operations due to COVID-19?**

A. When this occurs, the NCD vocational flight institution should submit current flight hours per standard reporting requirements based on the last day of training (time to report will be extended). VA will process and pay benefits for qualifying tuition and fee costs to the NCD flight institution.

**Q5) If a student becomes ill due to COVID-19 and they cannot continue training while the NCD 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 will need to 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.

**COVID-19: OJT/APP SCO FAQs**

**Q1) What happens when an OJT or Apprenticeship training establishment temporarily ceases operations due to COVID-19?**

A. We will be providing further guidance as soon as possible regarding continued payments that may be allowable under current laws.