

**Unless stated otherwise, normal rules as found in the SCO Handbook apply for all VA reporting requirements.**

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

**Q1) IHL – S.3503 Enacted: What impact does the enactment of this Senate Bill have on Institutions of Higher Learning (IHL)?**

Answer: 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.

Terms Moving Forward (not already submitted to VA):

Answer: IHL educational institutions which convert modalities as described above may submit certification of resident courses converted to online modality as resident courses if the start date of the term is prior to 21 December 2020.

- Use the Resident Credit Hour or Clock Hour portion of the VA-ONCE enrollment certification.
- Must enter Standard Remark “COVID-19 Residence Courses Taken Online” located within VA-ONCE

Note: Normal reporting requirements for all other changes should be completed per SCO handbook. (change in start/end date, change in credit/clock hours, etc.)

**Q2) Post 9/11 GI Bill Beneficiary – Monthly Housing Payments: What happens when a modality changes for enrollment terms due to COVID-19?**

Answer: 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 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.

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**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?**

Answer: Tuition and Fees reporting requirements will not change due to COVID-19 national emergency.

Examples: SCOs should review Change in fees associated to online modality, prorated building fees, etc.

Note: Regulations apply for same cost of program for non-veteran students. (all students)

**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?**

Answer: 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 these credit hours to the VA as resident credit hours during the authorized timeframe: 1 March 2020, to 21 December 2020.

Terms Moving Forward (not already submitted to VA):

Answer: SCO's may continue to certify Remedial/Deficiency courses due to COVID-19 conversion to modality if the start date of the term is prior to 21 December 2020.

- SCO must continue to use the R/D Credit hours section of VA-ONCE.
- SCO must enter Standard Remark "COVID-19 Residence Courses Taken Online"

**Q5) If an IHL educational institution changes term dates to include a new vacation break, or extends such a break, what steps should the SCO take?**

Answer: 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.

- If there is a change in enrollment dates, the SCO must adjust all elements of the enrollment certification to match actual enrollment timeframe. (includes break time and end date)
- Specific instructions for amendment reporting are in the SCO handbook.
- Standard and Non-standard term lengths are identified in the SCO handbook.

Example: if your facility's standard break was scheduled from 16 March 2020 to 20 March 2020, but the break was extended to 27 March 2020 due to COVID-19, school is

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to report that the break was changed to be 16 March 2020 to 27 March 2020. Additionally, if the start or end date changes, those changes must be reported.

Note: IHL's must make SAA aware of any changes in term dates. Current published commencement dates that fall within 7 days (week) still apply if a school makes a change.

**Q6) IHL temporarily ceases operations – discontinues training of all students: If an IHL educational institution temporarily ceases all operations due to COVID-19, what steps should the school take?**

Answer: 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.

Terms Moving Forward (not already submitted to VA):

Answer: When the IHL resumes operations, if the institution has same or new term dates all standard enrollment procedures remain in place.

IHL educational institutions which convert modalities as described above may submit certification of resident courses converted to online modality as resident courses for any training occurring between March 1 and December 21, 2020.

- Use the Resident Credit Hour or Clock Hour portion of the VA-ONCE enrollment certification.
- Must enter Standard Remark "COVID-19 Residence Courses Taken Online" located within VA-ONCE

**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?**

Answer: 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).

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- 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 for mitigating circumstances. If paper 1999b termination is reported, the SCO should include “COVID-19” in the remarks section.

Terms Moving Forward (not already submitted to VA):

Answer: When the IHL resumes operations, if the institution has same or new term dates all standard enrollment procedures remain in place.

IHL educational institutions which convert modalities as described above may submit certification of resident courses converted to online modality as resident courses for any training occurring between March 1 and December 21, 2020.

- Use the Resident Credit Hour or Clock Hour portion of the VA-ONCE enrollment certification.
- Must enter Standard Remark “COVID-19 Residence Courses Taken Online” located within VA-ONCE

**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?**

Answer: The SCO should review the IHL’s published attendance and “Incomplete Grade” policy as all normal VA reporting rules still apply.

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?**

Answer: 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 training portion without any further reporting requirements to the VA when a punitive grade is assigned. Normal non-punitive grade requirements have not changed.

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

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**Q10) What happens when an IHL's resident lab portion of a course is canceled or marked as incomplete due to the emergency situation and the IHL does not allow the student to move to the next class in the degree program? (i.e. Organic Chemistry 1 lab completion needed to enroll in Org Chemistry 2 next semester)**

**VBA Response:**

Answer: VA lacks authority to handle these situations in any special way due to COVID 19. The VA has instructed schools to follow their "Incomplete" grade policy and apply that procedure, if applicable. When the school is eventually able to continue training, the student will be allowed to complete the lab portion without any further reporting requirements to the VA. However, if the discontinued class is a prerequisite to future classes, the student cannot enroll in the next sequential required class until the prerequisite is complete.

If the IHL's "Incomplete" policy is not applicable, the SCO should report withdrawal from the class based on student's last date of attendance. The SCO should report COVID-19 as mitigating circumstances. But, if such a reduction changes the student's rate of pursuit, the student's monthly housing allowance may be affected.

**Q11) Should IHL's report enrollment changes when they convert from a standard grade scale (A, B, C...) to a Pass/Fail or other grading system due to COVID-19 national emergency?**

Answer: No, there is no need to report a conversion from a standard grading scale to a Pass/Fail or similar grading systems but there are other implications in doing so. Depending on the IHL's grading policy, classes taken Pass/Fail may result in a nonpunitive grade if the student fails the class. Rules about nonpunitive grades have not changed.

- Although VA does not typically make payments for classes resulting in nonpunitive grades, if COVID 19 is reported as mitigating circumstances for the student's receipt of a nonpunitive grade (i.e., Fail in a Pass/Fail class) VA will pay for the class.
- Refer to the SCO handbook for more information about reporting nonpunitive grades and mitigating circumstances.

Note: The IHL must make SAA aware of change in grading system.