

Alabama State Approving
Agency
2025 AVAA Conference

Agenda

- Approval Reviews: Full vs. Modified
- Prior Credit & Transcripts, and SCO Resources
- Practical Training
- In-state Tuition/Yellow Ribbon
- RBS vs Supervisory Visits
- Annual Reporting Fee Usage



Facility Reapproval: Required min. every 36-months – Checklist:

1. Application Form
2. Recruiting/Advertising Materials (currently in use)
3. School Catalog and Student Handbook
4. Excel Spreadsheet for All Programs (with changes indicated in dropdown or notes section)
5. New Program Documents (accrediting agency letter, program description, curriculum, instructors, advertising)
6. Department of Education Program Participation Agreement (PPA) if applicable
7. Sample copy of Shopping Sheet/College Financing Plan
8. Copy of Alabama Private School License, Business License, if applicable
9. Accrediting Agency's actions within the last year, if applicable
10. Signed VA Form 22-1919 (private/proprietary schools)
11. Sample Admissions Application
12. Sample Enrollment Agreement (for certificate programs, if applicable)
13. List of programs that require Remedial, Practical Training or Cooperative Training, if applicable

Modified Facility Review: Used to submit new catalogs, addendums to policy, add new programs, withdraw programs, or program name changes.

Checklist for Modified Approval:

1. Application Form
2. School Catalog with list of changes from prior approval, or Addendum with new policy or program
3. Excel Spreadsheet for Program Updates (new, discontinued, name changes, etc.)
4. New Program Documents (accrediting agency letter, program description, curriculum, instructors, advertising)

For Full and Modified Packages:

- **REVISE** your program list!
- Use your approval letter to review the program actions the SAA has taken. Check to see if programs have already been added, withdrawn, or previously denied.
- Use the most recent copy of your WEAMS and catalog to make sure you are not leaving approved programs off the list for continued approval.

Matriculated & Non-matriculated Definitions

Matriculated

- A student **has been** formally admitted to a college or university as a degree-seeking student.

Non-matriculated

- A student **has not** been formally admitted into a degree-seeking program.



Prior Credit & Transcripts: Title 38, Code of Federal Regulations, Sections 21.4253(d)(3) and 21.4254(C)(4).

- Schools should make every effort to obtain transcripts to comply with the requirement to evaluate and grant credit where appropriate. However, if a transcript cannot be obtained, you may continue to certify enrollment as long as the student has matriculated (**formally ADMITTED as degree seeking student**).

***Note: Every effort to obtain transcripts means documenting repeated attempts to get official or unofficial copies, confirmation of transcript requests, notes on who you spoke to that said “No” to providing it...keep it all in the VA file!**

- Reviews of prior credit policies will be conducted during compliance surveys and treated as approval issues if the school is not complying.

Non-Matriculated Students 38 CFR 21.4252 (L) (2) and (3)

- VA educational benefits cannot be paid to non-matriculated college or university students **unless** they are pending admission to your school. **In that case they can be certified for two standard length quarters or semesters.**
- The student can be certified beyond this two-term limit only if the student is **ADMITTED** to your school as a degree-seeking student, regardless of the number of credits taken.

SCO Transcript Resources

- **The ACE Military Guide**

Find information about the **American Council on Education (ACE) Military Guide (Guide to Evaluation of Educational Experiences in the Armed Services)** at their website.

- **Military Transcripts**

Find information about the Military Joint Services Transcripts (**<https://jst.doded.mil/official.html>**) and how transcripts may be requested by current and former members of the Army, Coast Guard, Marine Corps, and Navy at their webpage.

Current and former members of the Air Force can request transcripts from the **Community College of the Air Force (CCAF)**. Air Force personnel can obtain their transcript, even if they have not attended classes at the CCAF.

More information about military transcripts (**<https://www.va.gov/resources/how-do-i-get-college-credits-for-my-military-service/>**) can be found on the vets.gov website.

SCO Transcript Resources (contin.)

- National Student Clearinghouse (<https://www.studentclearinghouse.org/>)
- National Student Loan Data System (NSLDS) (<https://nsldsfa.ed.gov/>)
- Check for closed school contact information.

Practical Training (38 CFR 21.4275)

- Practical training is academic residential training that includes actual hands-on job experience. Some practical training is measured in clock hours (medical residency, for example) and some practical training is measured in credit hours such as internships, externships, and practicums.
- **When practical training is measured in credit by a school, the school can certify the course as credit or as clock hours, WHICHEVER IS TO THE STUDENT'S ADVANTAGE.**

**Additional documentation: obtain a copy of the student's work schedule, location, and supervisor information to keep in the file to back up the clock hour certification.

In-State tuition/Yellow Ribbon

- In accordance with 38 USC 3679(c), no veteran or similarly circumstanced persons (dependents) shall be charged anything other than the in-state tuition when attending a public institution of higher learning **regardless of residence.**
- Public Law 117-68 requires public institutions of higher learning to charge in-state tuition rates to students using the Survivors' and Dependents Educational Assistance (DEA) program (Chapter 35).
- Public Law 116-315 Section 1005 (Isakson & Roe) removes the requirement for covered individuals to enroll in a course at a public institution of higher learning **within 3 years of being discharged to receive in-state tuition.**
- If you are a public IHL charging out-of-state tuition and certifying for Yellow Ribbon, you are in **violation** of 38 USC 3679(c). **CHECK YOUR CERTS!**

Annual Reporting Fee Usage

DO's

- ❑ Fees to join your state's School Certifying Official association and attend conferences or host new VA student orientation.
- ❑ Setting up and/or supplying a Veteran's lounge or Vet Center on campus.
- ❑ Purchasing expendable supplies or needed equipment for the VA Certifying Official's office.
- ❑ Hosting a Veteran's Day luncheon or VA orientation for VA students where refreshments are provided.
- ❑ Purchasing cords for VA students' caps and gowns at graduation.

DON'Ts

- Building maintenance fees for a building or department **other** than the VET Center.
- Fees and charges by the college on its own departments associated with providing a service to **all** students on campus.
- Off-setting payroll expenses for non-SCO employees

ARF (contin.)

□ 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.

***Suggestion:** Create a separate account for the ARF whether you have 10 beneficiaries or 100 beneficiaries.

□ **Reason:** This ledger is reviewed during all surveys, and it makes for easy tracking of how these funds are being used.

RBS vs Supervisory Visits

RBS

- SAAs are under contract with the VA to assess potential legislative risk factors.
- SAAs are to confirm that the facility compliant with 38 U.S.C. approval requirements.
- A larger number of files are reviewed based on the total number of veteran beneficiaries enrolled.

SV

- Examines the facility's student records and verify policies are in place and enforced. A small number of files are reviewed.
- Opportunity to recognize and correct discrepancies or issues of non-compliance.
- Opportunity to establish and maintain a professional relationship through positive communication.

RBS vs SV (contin.)

- Do not be alarmed when you receive a notification of a visit.
- Follow the checklist included in the visit notification to ensure you are providing what is being requested.
- Do not be afraid to ask for clarification of documentation.
- SCOs must have access to student records and provide documentation to the SAA upon request. If your access is limited, seek assistance from the appropriate department to obtain the documentation.
- Do not send records in a 100-page file. Separate files by student name and separate document types.

SCO Resource Matrix

CERTIFYING OFFICIAL RESOURCE GUIDE	SCO Resources					SCO Handbook
Issue	ELR	SCO Hotline	SAA	Ask VA	VR&E	Resource
Updating Certifying Officials; VA Form 22-8794	X					SCO Training
Technical assistance with reporting enrollments				X		Ask VA
Enrollment Manager technical guidance		X				EM User Guide
85/15 reporting matters	X					85/15 Frequently Asked Questions
Clarification on WEAMS 1998 reports	X					ELR of Jurisdiction
Explanation of school overpayments or other payment issues		X		X		Ask VA
Request list of all overpayments by facility code or troubleshoot debt repayment issues				X		Debt Management Center
Individual student benefit information and hardship cases		X		X		Ask VA
Updated catalogs and programs. New/suspended/cancelled programs.			X			SAA
School address updates – including branch/extension			X			SAA
Changes in accreditation status, ownership or change of address			X			SAA
Chapter 31 Questions and Concerns					X	VR&E Handbook
Chapter 31 e-Authorization and Invoicing					X	VR&E e-Authorization and e-Invoicing

Laws to Reference:

- Isakson and Roe Veterans Health Care and Benefits Improvement Act of 2020 (**Public Law 116-315**)
- Colonel John M. McHugh Tuition Fairness for Survivors Act of 2021 (**Public Law 117-68**)
- Elizabeth Dole Act of 2025 21st Century Veterans Healthcare and Benefits Improvement Act (**Public Law 118-210**).

Nuggets to Remember:

- Read the “Notes to School” section of your approval letters. This section contains pertinent information to be aware of.
- Report changes in policies, accrediting agencies, government action, etc. to the SAA no later than 30 days after any date on which such educational institution becomes subject to an action or event.
- Applications for approvals and compliance surveys are not solely an SCO responsibility but a Facility responsibility. Seek assistance from other department if your access to student records is limited.

More Nuggets...

- **Suggestion:** Add to your catalog: “Institution maintains records of grades and transcripts (minimum of three years).”
- When sending files, send in PDF format if possible. Avoid sending links and shortcuts because they cannot be uploaded in the VA packages.
- YOU AND YOUR WORK ARE VALUABLE AND APPRECIATED!

SAA KNOWLEDGE CHECK