

Colmery Act Section 107 Recertification

Questions and Answers

Please note: This document has been updated as of December 2020, and replaces the FAQs released as of Fall 2019.

Over the past year, VA has been working on IT updates to pay GI Bill students location-based Monthly Housing Allowance (MHA) in accordance with Section 107 of the Colmery Act. This section mandates Post-9/11 GI Bill (Chapter 33) students are paid MHA based on the campus location where they physically attend the majority of their classes. On December 1, 2019, VA successfully implemented IT changes to pay MHA in accordance with the Colmery Act *point forward*. As of April 2020, VA successfully implemented IT systems updates that will allow VA to *retroactively* pay GI Bill students who were paid under the old rules between August 1, 2018, when the law went into effect, and implementation. This is an important step in making payments whole for impacted GI Bill students. Schools have until December 31, 2020 to complete all recertification. In addition to supporting schools through comprehensive training and communications, VA has compiled and maintained common questions and answers about this process. For additional questions or resources, please review the [School Training Resources](#) page or contact your ELR.

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Recertification Timeline

1. **What timeline do schools have to recertify?**
 - The recertification process will occur in two Phases:
 - **Phase 1** (April 29, 2020 through the end of calendar year 2020): All schools with an extension campus with a higher MHA than the associated main or branch campus, and the top 60% of schools with enrollments at extension campuses that require recertification based on VA data since December 1, 2019.
 - **Phase 2** (May 26, 2020 through the end of calendar year 2020): All other schools.
2. **How do I know which Phase my school is in?**
 - VA notified schools which phase they are in by GovDelivery email in early April 2020. Additionally, VA has published an [Extension Campus Report excel file](#) on the SCO training/webinars page, where SCOs can enter their main or branch facility code to see their assigned phase, and a list of their extension campuses.
3. **What is the deadline for schools to recertify?**
 - All schools have until December 31, 2020 to recertify all impacted student enrollments.
4. **What happens if my school does not complete the Section 107 Recertification process by December 31, 2020?**
 - If your school does not complete the recertification process by December 31, 2020, your school will be identified as non-compliant with VA policy and may be at risk for suspension or withdrawal of approval from the State Approving Agency.
5. **Is the recertification timeline impacted by COVID-19?**
 - We understand COVID-19 has introduced competing top priorities for schools and students, VA is giving schools until December 31, 2020 to complete the recertification process for all impacted student enrollments. Please find additional [COVID-19 FAQs here](#).
6. **What do SCOs need to do once all Section 107 Recertifications are complete?**
 - To validate that your school has completed the recertification process for impacted campuses, check the [Facility Extension Campus Report](#) (opens as Microsoft Excel download) for your school and review the [Section 107 Recertification Completion Training](#). Once you have confirmed that your school has finished the Section 107 Recertification process, please certify your school's completion by filling out the Section 107 Recertification Completion Survey located in the SCOs with Extension Campuses section on the [SCO Training Portal](#).

Recertification Waiver

7. **What is the recertification waiver?**
 - In order to streamline the recertification process, VA has implemented a recertification waiver where schools can forego recertifying retroactive enrollments for the following situations:
 - The extension campus has the same zip code or Military Housing Area as the main or branch campus, and
 - The quarter, semester, or term starts on or after August 1, 2018 but no later than November 30, 2019.
8. **How do I know which extension campuses are eligible for a waiver?**

- You can identify which extension campuses are eligible for a waiver by using the [Extension Campus Report excel file](#). SCOs can enter their main or branch facility code to generate a list of extension campuses that are or aren't eligible for waiver. NOTE: If you believe any extension campus information is missing or incorrect, please [contact your ELR](#) for recertification guidance.

9. If my school has an extension campus eligible for a waiver, do I have to submit any recertifications?

- Entire schools do not receive waivers, but extension campuses within the same zip code or Military Housing Area are eligible for recertification waiver for terms with start dates of August 1, 2018 to November 30, 2019.

10. If an extension campus qualifies for waiver, do I need to submit anything back to VA?

- No, if an extension campus qualifies for waiver, or if you do not have any recertifications to complete, you do not need to submit the waiver or anything back to VA at this time. However, please note that if one extension qualifies for a waiver, it does not mean all of your extension campuses do. Please review the [Facility Extension Campus Report](#) to see which campuses qualify.

Retroactive Payments

11. Will students have to apply or appeal to receive their corrected payments?

- No. Students will not have to apply or appeal for corrected payments.

12. How will impacted students receive information from VA ?

- All impacted students will receive a letter from VA stating if they were overpaid, underpaid or not impacted. Underpaid students will receive a lump-sum payment, students who were overpaid will have their claim reviewed on a case-by-case basis for appropriate action. GI Bill students who were overpaid solely as a result of the delay in MHA rate changes based on section 107 of the Colmery Act will not owe money to VA. SCOs are welcome to share the [MHA Adjustment Letters infographic](#) with students to help explain this information and these letters.

13. Will students receive notifications (email/letter) when we terminate their enrollment and submit a new enrollment?

- GI Bill students will receive a letter only after the 107 replacement enrollments are processed, which is why it is important to complete recertifications by student. By completing a student in one sitting, it helps ensure the student receives only one letter and one lump-sum payment (if applicable).

14. Will there be any tax burden on students?

- No. VA education benefits remain tax exempt.

15. Should we notify students before we recertify their enrollments?

- Yes. While VA has notified potentially impacted students, we recognize that SCOs are often our first point of contact with students and encourage you to reach out as well. We welcome SCOs to share the [MHA Adjustment Letters infographic](#) and let students know if they are on your list for enrollment recertification.

16. What happens when a modality changes for enrollment terms due to COVID-19?

- Based on legislation passed in March 2020, and extended in the fall of 2020, 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 residential training. The law authorizes this special authority from March 1, 2020 to December 21, 2021. Please find additional [COVID-19 FAQs here](#).

Recertifying Enrollments

17. Will schools have to recertify all students?

- No. Schools with extension campuses will have to recertify student's enrollments only if they were certified at the main or branch campus, but were attending an extension campus during an enrollment with a term, quarter, or semester start date after August 1, 2018. Extension campuses located in the same zip code or Military Housing Area are eligible for a recertification waiver for enrollments with term start dates from August 1, 2018 to November 30, 2019. (See FAQs under "[Recertification Waiver](#)")

18. Which enrollments do I need to recertify? Do I need to recertify online/distance courses?

- SCOs should recertify enrollments where the student attended an extension campus for some or all of their courses but were certified to the main or branch campus instead, for terms with start dates on or after August 1, 2018.
- Online only enrollments do not need to be recertified. If a student took classes online **and** at an extension campus, the enrollment must be recertified.
- Some extension campuses are eligible for a recertification waiver for enrollments with term start dates from August 1, 2018 to November 30, 2019. (See FAQs under "Recertification Waiver")

19. How do I recertify enrollments that were impacted by Section 107?

- VA has provided step by step instructions on how to recertify enrollments in VA-ONCE in the [Recertification Quick Reference Guide](#) and in demonstration videos, both of which can be found on the [School Resources Page](#). If you have additional questions after viewing the instructions, please [contact your ELR](#) for support.

20. How do I recertify an enrollment for a term that was terminated for graduation/suspension/etc.?

- VA has provided step by step instructions covered in scenarios 6 and 7 of the VA-ONCE recertification videos and the [Recertification Quick Reference Guide](#), both of which can be found on the [School Resources Page](#). If you have additional questions after viewing the instructions, please [contact your ELR](#) for support.

21. Can I replace the original enrollment certification with certifications at multiple extension campuses if the student took classes in more than one location?

- Yes. In doing so, please make sure that the hours and tuition and fees entered for each of the replacement enrollments add up to the hours and tuition and fees on the original certification. VA has provided step by step instructions on how to recertify enrollments given various scenarios in the VA-ONCE recertification videos and the [Recertification Quick Reference Guide](#), both of which can be found on the [School Resources Page](#). If you have additional questions after viewing the instructions, please [contact your ELR](#) for support.

22. What Termination Reason in VA-ONCE do I use to recertify?

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- SCOs must use the “Colmery Section 107” termination reason when terminating an enrollment certification due to Section 107. This termination reason must only be used for Section 107 terminations. Enrollment certifications that are terminated using the “Colmery Section 107” termination reason must be replaced using the “Colmery Replacement” process. Step by step instructions on how to recertify enrollments in VA-ONCE can be found in the [Recertification Quick Reference Guide](#) and in demonstration videos, both of which can be found on the [School Resources Page](#).

23. Can I submit the replacement recertification on the same day as the termination?

- Yes. Replacement certifications must be submitted immediately after a Colmery Section 107 termination. Multiple 107 terminations and replacements can also be entered on the same day and are encouraged so students only receive one notification letter.
- Note: All enrollments that are terminated using the Colmery Section 107 Termination reason **MUST** be replaced. This termination reason is specific to Colmery Section 107 and is not to be used for any other terminations.

24. How do I submit a replacement for a 107 termination when I receive an error that states “No new Colmery certifications can be opened until all other unsubmitted certifications are deleted or submitted”?

- For unsubmitted certifications pending under your own facility code(s) that are preventing a 107 replacement, review the certification to determine if it is a valid certification which needs submitted, or a certification which needs deleted. After completing the appropriate action, you will be able to complete the replacement for a 107 termination.
- For unsubmitted certifications pending under another school’s facility code preventing a 107 replacement, please document the students you cannot submit a replacement for and [contact your ELR](#) to resolve the open recertification from another school. Your ELR will inform you when the open certifications are resolved so you can submit any replacements for 107 terminations which could not be completed.

25. Should I recertify enrollments for terms that started on or after December 1, 2019?

- All SCOs were instructed to certify enrollments with term start dates on or after December 1, 2019 to the approved campus location where a student is/was physically attending classes, including extension campuses. If you have certified enrollments incorrectly after this date, please [contact your ELR](#).

26. How do I recertify an enrollment with an amendment or an adjustment?

- The Section 107 Recertification process will allow you to terminate and replace enrollments and amendments. Therefore, if an enrollment has an amendment, you will terminate and replace the latest amendment. If the enrollment has an adjustment, you will be unable to terminate the adjustment. You will need to terminate and replace the enrollment and then submit an adjustment on the replacement enrollment following the same steps you took to adjust the original enrollment. Please see the [Recertification Quick Reference Guide](#) for step-by-step instruction.

27. If I find a mistake in a past certification (such as T&F), can I correct it during recertification?

- No. SCOs must complete all standard reporting amendments or adjustments to the term before they start the recertification process. The information on the replacement enrollment(s) must match the original enrollment, except for the campus location(s).

- Note: This may create school or student debts or additional payments depending on the type change reported. Once the enrollment is accurate, the SCO may begin the recertification process.
- Reminder: The 107 Recertification Process should only be used to recertify enrollments where an individual was attending an extension campus instead of a main or branch campus on or after August 1, 2018. We recommend contacting your ELR if you have a complex enrollment period to correct or recertify for section 107.

28. Will Section 107 impact graduate non-standard terms?

- No. Section 107 implementation will not impact graduate non-standard terms.

29. Do I need to recertify Non-College Degree program enrollments?

- Yes, Non-College Degree (NCD) programs should be recertified using the same process as all other Section 107 enrollment recertifications. Please make sure the NCD replacement certification has the total amount of approved hours correctly indicated.

30. Will Section 107 or recertification of enrollment impact the calculation for the rate of pursuit?

- No. The rate of pursuit calculations will not change. Students will receive Monthly Housing Allowance based on where they are taking the majority of their classes.

31. Will recertification of students impact the annual reporting fee?

- No. VA does not count duplicate enrollments, so the annual reporting fee will not be impacted.

32. How are clinicals, student teaching, independent study and study abroad impacted?

- Off-campus trainings should NOT be recertified using Section 107. Enrollments that include off-campus training (including internships, practicums, externships, clinical rotations, and residencies), should be certified to the location of the campus where the student is enrolled, as long as the “off-campus training site” does not meet VA’s campus definition requirements (link: [campus definitions](#)). It is at the discretion of the SAA whether or not teaching sites or practicums are approved extension campus locations.

33. What changes should schools who process enrollments on paper be aware of?

- Schools should seek to use VA-ONCE as much as possible, as all types of enrollments are eligible to be processed through VA-ONCE. However, all recertification guidance also applies to paper enrollments.

34. Can I use the Section 107 recertification process to recertify a student to another main or branch campus?

- No. The Section 107 recertification process is only to be used when recertifying an enrollment term starting between August 1, 2018 and November 30, 2019 that was certified to a main or branch campus when the student was taking one or classes at an extension campus. The replacement enrollment must be certified to the appropriate campus.

Extension Campuses in WEAMS and VA-ONCE

35. Will SAAs let schools know if their clinical location is considered an extension campus?

- VA encourages SCOs to work with their SAAs to determine whether specific locations meet the requirements to become approved extension campuses. VA provides overarching guidance on the definition of an extension campus. However, states may have their own individual guidance on how they define an extension campus. Any extension campus submitted to VA must meet VA requirements and be approved by the SAA.

36. If there are multiple extensions in the same zip code, will schools need request facility codes for those sites separately?

- Yes, these extension campuses will need to be submitted separately to receive individual facility codes.

37. How will out-of-state extension sites be handled for extension campuses?

- All training must be approved by the State Approving Agencies (SAA) of the respective states. Any training location that crosses state lines where a student is physically attending classes must be approved by the SAA in the respective state. [For a listing of all SAAs, please click here.](#) It is solely left to the SAA, in their adjudicative authority and discretion, to determine, as a preliminary factual matter, whether a school's proposed training location is one that constitutes a "campus" of the educational institution. Only after the SAA determines that a proposed training location constitutes a "campus" will the SAA be then required, in accordance with VA regulations, to determine whether to approve the campus as either a main, branch or extension location. If a campus is located across state lines the SAA of the respective state has sole approval discretion. A school must have at least one "campus" in the state with administrative capabilities; if an extension location has administrative capabilities it may be approved as a stand-alone campus in the state.

38. How will overseas campuses of US schools be handled? What about schools that are located on an international border that may have extension campuses located in another country (e.g. Vancouver)?

- SAAs may approve programs of a US main campus conducted at an extension campus in a foreign land. The SAA has the full authority to determine if the program meets the criteria of the law, otherwise, they may refuse to approve the location. The foreign housing rate is the national average MHA rate. If a student is taking a distance education course from a campus located in a foreign country, the foreign housing rate is half the national average MHA rate.

39. How should SCOs proceed if a campus location is not available in WEAMS/VA-ONCE?

- If a campus location is not found in WEAMS/VA-ONCE, the campus is not approved. Schools *cannot* certify enrollments for courses at an unapproved location to the main and/or branch location. Please work with your SAA to seek approval of these campuses.

40. I have an extension campus that does not have a facility code; how do I get a facility code so I can recertify students who attended there?

- If an extension campus does not have a facility code, your school should contact your State Approving Agency (SAA) immediately to begin, or check on, the approval status of the facility. Once the SAA approves a facility as an extension campus, the ELR can enter the facility into WEAMS where it will receive a facility code. Per VA policy, students should be certified to the location where they physically attend classes. VA cannot pay benefits for a GI Bill student attending a course(s) at a location that is not approved by the SAA.

- 41. What if my extension campus has not been submitted, or is not showing in WEAMS or VA-ONCE?**
- Schools should work with their State Approving Agency (SAA) using the standard process for adding a campus location. Once an SAA approves a campus location, the SAA will work with the ELR to load the location into WEAMS and VA-ONCE.
- 42. Where do we find paperwork to add an Extension site?**
- Please contact the SAA of jurisdiction regarding documentation concerns, as each SAA may have different requirements. [For a listing of all SAAs, please click here.](#)
- 43. Who adds the extension facility codes to VA-ONCE?**
- Schools submit campuses for approval to their SAA and the SAA works with their ELR to have the campus added (for new campuses) or updated (for changes to existing campuses).
- 44. How do you know what extension campus is assigned to what sub-facility code?**
- In VA-ONCE the extensions are included in the drop-down on the Select Student page and in the drop-down when adding a student. Extension campuses are also visible in WEAMS and the GI Bill Comparison tool.
- 45. I do not see any extension campus sub-facility codes in VA ONCE. What do I do?**
- Please contact your SAA of jurisdiction to determine if they are aware of your extension campuses, and if they are providing these to VA. If not, the SAA will provide further instruction on the approval process.
- 46. I have a foreign campus that was recently issued a facility code, should I recertify students who attended classes at the foreign campus?**
- Yes. If your school's foreign campus was issued a facility code as a result of the Colmery Act Section 107 (location-based housing), students who attended that campus for terms with start dates on or after August 1, 2018, should be recertified using the same process as outlined for extension campuses. This will adjust their Monthly Housing Allowance rate to Foreign Rate MHA for the impacted terms. Note: Students will receive a letter explaining the difference in the MHA amount.
- 47. If a school receives new facility codes for our other training sites, will we need to submit additional designation of certifying official forms?**
- The addition of an extension campus alone does not require a new certifying official form to be completed. All certifying officials at the main or branch campus will have access to the extension facility code. VA Form 22-8794 should be completed when a new certifying official is added or certifying official information changes.
- 48. Main and Branch campuses often share extension sites. Is it correct to assume that these extension sites must be provided for each distinct Facility Code?**
- The extension campus only needs one sub-facility code. Within WEAMS the extension campus is linked to the campus(s) to which it is associated. If the school has separate SCO's at the main and branch, VA-ONCE can associate the sub facility code to the appropriate accounts so the SCO from either the main or branch can certify.
- 49. Where do we see the sub facility codes WEAMS or VA-ONCE?**

- You will be able to see them on both the 22-1998 report received from your ELR and in VA-ONCE. In VA-ONCE the extensions will be included in the drop-down on the Select Student page and in the drop-down when adding a student. Extension campuses are also visible in WEAMS and the GI Bill Comparison tool.

50. Will VA-ONCE users with “2p” access be able to see all extension sub-facility codes or will they need separate accounts for each?

- Assistant accounts can have access to multiple facility codes, including extensions.

51. Is there training on the new functionality in VA-ONCE? How is Training being Communicated?

- Yes, recertification training was held in April 2020. The training materials are posted on the [School Resources Page](#), including VA-ONCE videos, a comprehensive scenario [quick reference guide](#), and the [training presentation](#). Please make sure you are subscribed to [GovDelivery](#) to receive information on future training.

52. How do these changes impact the parent-guest relationship?

- VA is currently reviewing the impact to parent/guest student relationships to determine if changes are needed to the process. VA will release additional information as it becomes available.

53. If the campus has an extension, how will that be displayed in the sub-facility code?

- The third, fourth, fifth and sixth digits of the facility code are changing to create the new sub-facility code. The system will prevent duplicate sub-facility codes from being created. The third digit will be an ‘X’, and the fourth, fifth and sixth digits will be assigned by the system in sequential order from 001 – 999. All other remaining digits will remain the same.
- For example,
 - i. 11X01138 (first extension campus identified)
 - ii. 11X02138 (second extension campus identified)
 - iii. 11X101138 (101st extension campus identified)

Monthly Housing Allowance and Tuition & Fees

54. Do schools need to calculate if the student has completed a "majority" of their training in an alternate zip code?

- No. Schools do not determine the majority of where classes are taken. Rather, schools are expected to submit enrollments with the appropriate facility or sub-facility code based on whether the location is a main, branch, or extension campus. Each extension campus will have its own sub-facility code, which will map to the zip code of the extension facility location. That information will be stored in WEAMS and VA-ONCE.

55. Will distance learning be impacted?

- Solely distance learning will not be impacted by these changes. The Colmery Act did not change MHA calculations for these programs. Therefore, MHA for individuals enrolled in these programs will be paid as they are now at half of the national average. Solely distance courses will continue to be certified as distance hours at the main or branch campus.

56. Do students usually know if they are at the main campus or at the branch location?

- Schools will need to provide guidance to students as to whether they are attending a main, branch, or extension campus. Students are also encouraged to use the [GI Bill Comparison Tool where](#) they can search for their school and select their campus location to find their MHA rate.

57. Is the GI Bill Comparison Tool updated with new facility and sub-facility codes?

- Yes. The [GI Bill Comparison Tool](#) has been updated with extension campus data. Currently, Students can search for their school and select their campus location on the Comparison Tool to see their housing rates.

58. How do you divide up the Tuition and Fee charges if it is a flat rate tuition charge for students who take courses at the main campus and an extension campus?

- Schools that charge flat rate tuition must also report the net tuition and fees. When a student is enrolled in modular terms (i.e. mini sessions within the standard term), the net tuition and fees should be associated and reported with the first credits that total the minimum number of credits required to be a full-time student at the school. Please see 'Certifying Tuition and Fees' section of the SCO handbook for examples of how to accurately certify net charges for modular terms at schools with flat rate tuition.

59. If you have a student that decides to transfer campuses in the middle of a 1500-hour course, do you have to enter tuition and fees as entered initially or do you need to prorate for the hours taken at the new campus?

- Based on this clock hour program scenario, the tuition and fees would need to be prorated, and prior credit provided. This would ensure that any change in MHA is processed correctly, and in case of a withdrawal, the correct debts would be created.

60. What rate will be paid if there is no majority of classes (e.g., a student takes 6 undergraduate credits at a main campus and 6 credits at an extension campus in a single semester)?

- If there is no majority, then the student will be paid the MHA rate that is most advantageous to the student.

61. What rate will be paid if a student takes the majority of classes at an online location (e.g., what if a student's takes 3 course units at a main campus, while taking 9 course units of online courses)?

- VA will pay the rate for the residential (in this scenario, main campus) facility

Communications

62. How will VA communicate with students about changes to their MHA due to Section 107 Recertification?

- VA has notified all potentially impacted students letting them know that the recertification process is starting and they may receive additional information explaining how they have been impacted. Students will then receive letters from VA that include information on any rate changes due to Section 107, if applicable. Additionally, SCOs are welcome to share the [MHA Adjustment Letters infographic](#) with students to help explain these letters.

63. Why are we receiving school debt letters or payments for recertification made using the 107 remark in VA ONCE?

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- 107 Recertifications completed using the Section 107 Recertification process should not generate any debts or payments to the school because tuition and fees on the replacements should match the 107 terminated original enrollment.
- Debt letters or payment may be generated if:
 - An enrollment was terminated and the Colmery 107 reason was not selected
 - A replacement was created, and the Colmery 107 replacement reason was not selected to connect it with the terminated enrollment
 - An adjustment was made to a Colmery 107 replacement that added additional Tuition and Fees
 - An error occurred during recertification processing
- Note: If you receive a debt letter or payment for a Section 107 Recertification, please use the Submit a Question button on [the GI Bill contact page](#) so VA can look into the claim and help correct any errors.

64. Will SCOs receive copies of the communications that are sent to students?

- VA will send a copy of the language we send students to SCOs and keep SCOs informed when communications are sent to students.

65. What are VA's change management and communication strategies for keeping GI Bill students and schools informed?

- VA will keep steady communication with schools and students throughout the recertification process. We will continue to facilitate webinars/office hours specifically focused on process changes and training. In addition, VA will communicate regularly via e-mail, social media, and this FAQ document will be updated as we receive additional questions about the process. All recertification training material can be found on the [Education Service Webinars](#) page of the School Resources website.

66. What communications tools are available?

- The NEW [MHA Adjustment Letters Infographic](#), includes information on the Section 107 Letters that will be sent out to impacted students upon enrollment recertification. The [MHA Communications Toolkit](#), and the [MHA Rate Change infographic](#) also provide student-ready messaging.

67. How is VA using social media to reach students?

- Social media will be a component of our approach to reaching students. Beneficiaries can use [The Post-9/11 GI Bill, U.S. Department of Veterans Affairs](#) Facebook page for up-to-date information on all things GI-Bill related. Important information will also be released through VA and VBA's main Facebook and Twitter pages.

68. Will the Call Center be trained to answer student concerns regarding MHA rate adjustments?

- VA has provided Q&A information to the Call Center; our staff have all of the available information and are able to answer any student questions. Students will use the same number as for other GI Bill questions (1-888-442-4551; from Overseas: 001-918-781-5678).

If you have further questions please reach out to your VA [Education Liaison Representative](#).