**Training Script**

***Retroactive Reimbursement for a Period Previously Paid under Chapter 33***

**Slide 1**

Today we will address Retroactive Reimbursement under Chapter 31 for a period of prior training completed under Chapter 33. This training module is intended to help with the implementation of VA Circular 28-15-01, dated October 1st, 2014.

**Slide 2**

Learning Objectives: At the conclusion of this training, VR&E Staff will be able to answer the following questions about Retroactive Reimbursement:

What is Retroactive Reimbursement?

Is it the same as Retroactive Induction?

What conditions must be met to approve Retroactive Reimbursement?

How is Retroactive Reimbursement processed?

What are the responsibilities of the Veteran, the VRC, the VR&E Officer and Finance?

**Slide 3**

OK, first a review. VR&E has existing procedures for processing retroactive inductions for a period a Veteran was previously paid under another VA education benefit – typically that would be under Chapter 30. Specific conditions must be met in order to authorize retroactive induction.

The Veteran must be eligible and entitled to Chapter 31 for the period being considered.

The prior training must contribute toward achieving the approved vocational goal under Chapter 31.

These conditions are outlined in CFR 21.282 and M28R Part IV Section C Chapter 2. Before authorizing or paying any benefits under Chapter 31, an overpayment must be created for any VA education benefits already paid for that period.

**Slide 4**

When the Post-9/11 GI Bill, Chapter 33, was created in 2009, benefits included more than just the monthly allowance a Veteran was paid under Chapter 30. So, to authorize a retroactive period that had been paid under Chapter 33, tuition and fees, books and supplies, and yellow ribbon payments would also have to be accounted for. VR&E Service tried to work with Education Service and the Office of Resource Management, but there was no easy way to establish and offset debts for all those items. The process would have been an administrative nightmare with plenty of opportunities for mistakes. So we asked General Counsel if we could just go back and pay the difference between what the Veteran had received under Chapter 33 and what she would have been paid under Chapter 31 – keeping all other conditions for approving a retroactive period the same. You will notice here that the 2nd major bullet lists the same conditions that must be met to approve retroactive induction except for creating the overpayment.

**Slide 5**

When we went to General Counsel we cited a 1995 Court of Veterans Appeals decision in which the Court ruled that VA should do exactly what we were proposing to do: Calculate and pay the difference in benefits that would be due to the Veteran who had used Chapter 30 for a prior period of training.

**Slide 6**

Here’s a quick overview of the process of requesting and approving Retroactive Reimbursement. We will go through each step in the process and review this slide again near the end of the training.

**Slide 7**

So let’s go over the criteria to qualify for retroactive reimbursement. Again, this should be familiar because it is the same procedure as currently exists for retroactive induction for Veterans who had used Chapter 30 or had paid for their own training before coming to Chapter 31.

The VRC must find the Veteran currently eligible and entitled to Chapter 31 and that also applies to the period of prior Chapter 33 training being considered for reimbursement.

The training must be suitable for achieving the vocational goal that is approved in the IWRP.

The Veteran must provide documentation of the costs of the prior training, including how any payments and financial aid were applied to those charges.

An IWRP is developed or re-developed and VR&E Officer concurrence must be obtained.

The only difference here is that the Veteran must request the retro in writing and elect a beginning date for the retro period as well as a date of actual transfer to Chapter 31.

**Slide 8**

Here’s an overview of the roles and responsibilities of the various players in the process that was spelled out in the circular. We’ll go over the process to show you in more detail what actions are required in each step.

**Slide 9**

Ideally, a discussion of which benefit is most beneficial to the Veteran and consideration of any Chapter 31 coverage for a previous period of training should take place during the initial evaluation and planning appointments. However, if a Veteran does not request retro until a later time, the VRC must go through the decision-making process at that time. Attachment 2 from the circular “Transfer to Chapter 31 – VRC Checklist” is a good job aid for this purpose. The issues that must be explained to the Veteran and that require signatures are Attachment 1: Election of Chapter 31 Benefits, Attachment 3: Transfer to Chapter 31 - Instructions to the Veteran, and Attachment 5: Veterans Checklist for Retroactive Reimbursement. You must also help the Veteran determine whether electing Post 9/11 Subsistence Allowance is possible for the retro period and whether retro approval would be financially beneficial.

These documents are currently on the KMP and will eventually be incorporated in the M28R manual.

**Slide 10**

The VRC must also take certain actions and document them when a Veteran requests retroactive reimbursement. In later slides, we’ll look at how you will use LTS and SHARE to obtain some of the necessary documentation. The period of prior training must fall within the Veteran’s eligibility and entitlement under Chapter 31.

Training must be suitable for the vocational goal established under Chapter 31.

The VRC and the Veteran will develop, but not sign, the IWRP and the VRC will prepare the Memo for VRE Officer concurrence.

It is the VRC’s responsibility to document and justify why retroactive reimbursement is being authorized.

**Slide 11**

It is the VRE Officer’s responsibility to ensure that the documentation and justification is accurate and appropriate. For those initial retro requests that have been pending while VA Central Office was developing procedures, we are not requiring that every course in the period of prior training completed under Chapter 33 must count toward the Chapter 31 goal, as long as most of the courses for a term or semester do count. We are doing this to reduce the administrative burden on VRCs. We may re-visit this condition at some point and go back to requiring that every course must be able to be used toward the Chapter 31 goal. If we do, we will provide appropriate notice to field staff.

If VR&E Officer concurs, the VRC and the Veteran will sign the plan and the Veteran will follow the instructions in Attachment 5 to gather the required documentation. If VR&E Officer does not concur, the reasons must be documented on the Retro Memo, Attachment 4, and or in a CORPORATE WINRS note and the VRC must send the Veteran a denial letter and appellate rights.

**Slide 12**

Before we discuss and demonstrate the Calculator Tool and the data needed for that, let’s go over the retro process for cases that have been closed. Closed means either rehabilitated or discontinued. These steps will be slightly modified from the guidance we just reviewed.

The first thing that’s required when a case has been closed is a written request for retroactive reimbursement. If there is already a request documented in the CER or CORPORATE WINRS, then the VRC must contact the Veteran to begin the process by having the Veteran sign the required election forms. If there’s no documentation of a request in the CER folder or CORPORATE WINRS, then the VRC is not required to contact the Veteran, but if a Veteran contacts VR&E, then we must start with the same steps to have the Veteran sign the election forms. Remember, we should only proceed with this process if all other conditions for retroactive reimbursement are met, including that the prior training contributed to the achievement of the vocational goal in the IWRP.

**Slide 13** So, if the conditions are met, get VR&E Officer concurrence, activate the case in CORPORATE WINRS because all closed cases have automatically been archived….so you must search the CORPORATE WINRS database for the Veteran’s record, then click the Activate button.

DO NOT reopen the case, DO NOT change the case status, Do NOT re-develop the rehabilitation plan. Begin to gather the necessary financial information that will be entered in the Calculator Tool. Now these steps are a little ahead of what we have gone over so far, but you’ll see later that we take these same actions for every Retroactive Reimbursement!

Populate the required fields in the Calculator Tool and determine the amounts to be reimbursed.

Create a direct reimbursement transaction in CORPORATE WINRS for tuition and fees, and for books and supplies

Provide a copy of the calculator Tool summary sheet to Finance, FAX a copy of the summary sheet to VR&E Service using the Fax Cover Sheet in Attachment 8, file a copy in the CER and create a CORPORATE WINRS note describing the justification for retro reimbursement and the amounts due to the Veteran.

Notify the Veteran when the reimbursement payment has been processed by Finance.

Then, remember to go back into CORPORATE WINRS and archive the case.

**Slide 14**

If the Veteran had requested retro reimbursement and the conditions to approve it had not been met, or the VRE Officer did not concur, send a denial letter and appellate rights.

There’s one other scenario that’s unlikely, but it might occur occasionally. A Veteran whose case has been rehabilitated or discontinued could re-apply for Chapter 31 benefits. If that Veteran then completes the initial evaluation and is found entitled, a retroactive reimbursement could be considered for a prior period of training for which the Veteran had used Chapter 33 benefits. The guidance provided in slides 6 through 11 would be followed. If the conditions were met and the prior training under Chapter 33 was suitable for achieving the vocational goal in a new IWRP, then retroactive reimbursement could be approved for that period of prior training.

That finishes up closed cases; let’s pick up where we left off with active cases.

**Slide 15**

OK, so now we’re at the point in the process where the retroactive reimbursement has been approved and the VRC needs to get the data or information that will be plugged into the Calculator Tool.

The Veteran will have the major responsibility for gathering and submitting documentation of the costs of prior training. Once the Veteran elects a date for retroactive purposes and elects a date to actually transfer to Chapter 31, the Veteran will follow the guidance in Attachment 5 and submit the following documentation to the VRC:

Documentation of actual costs of tuition and fees for the retro period.

Documentation from the training facility showing how any financial aid was applied to the Veteran’s account

Receipts for books and supplies, but only if the Veteran claims that they cost more than the book stipend that was paid under Chapter 33. A syllabus or other documentation may be needed to show what books were required for a course. If the Veteran is not requesting reimbursement for books and supplies skip this step and do not include any data on books and supplies in the Calculator Tool.

Transcripts showing the grades received for completed courses. Reimbursement cannot be approved for a course that was not completed or does not count toward the Veteran’s graduation requirements or program completion.

**Slide 16**

The VRC will advise and assist the Veteran regarding how to obtain the necessary documentation.

Review LTS and SHARE to determine the actual amount of benefits paid under Chapter 33 for the prior period of training. We will look at LTS and SHARE screens later to identify where to locate necessary information.

Use the Calculator Tool to determine the amount to be reimbursed for each category

Coordinate with Finance to process the reimbursement then notify the Veteran of what is being paid.

**Slide 17**

Before we get into the LTS screenshots, I want to remind you that training on how to use LTS was created by Education Service and is available in TMS under item number VA 3877249. If you have not yet completed that training, please do so – it will help you navigate through LTS.

**Slide 18**

OK, so once you have logged in to LTS you will see the Search Chapter 33 screen. There you will enter the Veteran’s Social Security Number and click the “Search Chapter 33” button and the Work Product History screen will be displayed. You should click “View” for the most recently authorized work product. If the status of a work product is “In Progress” then you should contact the RPO to determine what action is pending and to be sure no further Chapter 33 awards will be processed.

**Slide 19**

Once you click view, the Work Product Summary screen will appear. One important thing to notice on this screen is that the “Date Last Paid” is not necessarily the last date of the Chapter 33 monthly allowance. It could also be the date a payment of tuition and fees or books and supplies was issued.

**Slide 20**

As you scroll down to the Enrollment Summary you will see a display of the various term dates that Chapter 33 benefits were paid. The dates that fall within the approved period of retroactive reimbursement under Chapter 31 are the dates you will use to plug in to the Calculator Tool.

**Slide 21**

As you continue to scroll down, the Net Awards section shows recent recurring payments. The first highlighted rectangle shows a monthly housing award. Please note that $1449.00 is the authorized monthly amount – this screen does not show how much the Veteran was actually paid for each month or partial month during the term. The VRC would need to check SHARE for that information. This screen also shows lump sum payments. In this case a tuition and fees payment of $500 is highlighted in the second rectangle. Payment of books and supplies would also show up on this screen. Term dates, facility codes and payment amounts are listed for these lump sum payments. This information will also be used in the Calculator Tool.

**Slide 22**

Scrolling down further, the Lifetime Awards section shows the payment history for the entire duration that Chapter 33 benefits were paid. There are separate sections for Recurring Payments (monthly housing allowance) and for Lump Sum Payments (tuition and fees or books and supplies)

**Slide 23**

Now we will look at Chapter 33 information in SHARE:

From the VBA Ready Screen in SHARE, select “Payment History Inquiry” from the menu on the left side, type in the Veteran’s Social Security Number and click “Submit”. Once you get to Payment History Inquiry, you’ll need to know how to identify different types of payments and match them up with the term dates from LTS. This screen shows the same type of payment information as the TINQ screen from the BDN system.

Payments listed as “Regular” are disability compensation payments.

Payments listed as “Retroactive C&P” are retroactive disability compensation payments.

Payments listed as “CH31 Recurring” are regular Chapter 31 subsistence payments.

Payments listed as “CH31 Retroactive” are payments on Chapter 31 awards that are entered after Full File Pass, resulting in a larger lump-sum payment.

Other benefit types, such as 1607, also appear and are easy to identify.

The ones we are looking for are Chapter 33 payments:

The payments listed as “33-SC-E” are the payments made directly to the training facility – on this slide it’s the one highlighted in yellow. These are also typically identified by the name of the training facility in the Address Line Two column. These payments are for tuition and fees including any Yellow Ribbon payments.

The payments listed as “CH33-EFT” are direct payments to the Veteran. They are also identified by the name of the Veteran listed in the Address Line Two column. On this screen most CH33-EFT payments are for Monthly Housing Allowance.

Payment for Books and Supplies would also be listed as “CH33-EFT”, so it is important to identify those in LTS then check here in SHARE to be sure they were paid.

**Slide 24**

Here’s a copy of actual documentation received from a school showing the charges for one semester as well as financial aid and payments made to the Veteran’s account. From this example we can see that charges that could have been approved under Chapter 31 are the tuition, all the items listed as fees, but not the parking fine of $10.00. We would need more detailed documentation to consider whether charges at the bookstore might be approvable under Chapter 31. Under Financial Aid we would be looking for any scholarship, grant or waiver that specifically had been applied to tuition. The way this school did this accounting, we cannot identify any specific financial aid that was used to reduce tuition charges.

We can also see that Chapter 33 paid $3,147.09 and we know any Chapter 33 payments to schools would have to be for tuition and fees.

**Slide 25**

We’re getting closer to the live demonstration of the Calculator Tool, so we want to think about what we found in LTS and SHARE and what data is available through documentation from the school or from the Veteran.

From LTS we can get the term dates and the facility code to help us identify the zip code of the facility. Awards in LTS will also help us figure out which payments in SHARE correspond to which terms and what those payments were for. In SHARE we can see the actual amounts that were paid to the Veteran and to the school and we can identify what those payments were for. From the school we need to be able to identify the actual charges for the term and determine which charges would have been approvable under Chapter 31. We also need to determine whether tuition was reduced by any financial aid or was reduced for some other reason such as a waiver or the school’s participation in the Yellow Ribbon program. We can also see what payments were received from the VA. If the Veteran is claiming reimbursement for costs of books and supplies greater than what was paid under Chapter 33, then further documentation is needed to identify exactly what was purchased and show that it was required to complete the coursework in that term.

**Slide 26**

OK, let’s explore a scenario with actual data that we can plug into the Calculator Tool. This Veteran met the criteria for approving two terms of Chapter 33 training that will count toward the Chapter 31 vocational goal. After reviewing LTS, SHARE, and documentation from the school and the Veteran, the data we need for the demonstration is listed here. Now let’s look at the Calculator Tool that was included as Attachment 6 in the circular.

**Slide 27**

The Tool is an Excel Spreadsheet. The first sheet is a Sample to get you familiar with how you will use the tool. The only places you will need to enter information are in the green shaded cells. Some things you will get from the Chapter 31 record like name, social security number, facility. Other information will come from LTS or from documentation from the school or the Veteran such as costs of the previous training or what has already been paid by Chapter 33. And for the section on Chapter 31 subsistence allowance, you may have to use other resources such as the link to the DoD BAH calculator or the sheet that lists the traditional subsistence allowance.

You’ll see the note on this page about needing to break a term into two separate time periods if there is a cost of living adjustment during the term. Here’s where the difference between Chapter 33’s rules and our rules should help us. Chapter 33 COLA takes effect on August 1st every year, but the COLA for Chapter 31 Post 9/11 Subsistence Allowance takes effect the same day as the DoD BAH rates and that is January 1st. I think you’ll find that January 1st occurs during very few terms. It doesn’t matter if the Chapter 33 COLA occurs during a term because we are using the actual amounts paid under Chapter 33 from SHARE and LTS – we are not using the tool to figure out those amounts.

OK, let’s show you a specific example of where you’ll get this information and how you’ll enter it. Let’s go to the tab for Time Period 1. Enter the name of the Veteran and the VRC. Enter the Veteran’s Social Security Number. Enter the name of the school or institution. For “Time Period Start” enter the first day of the term – you got this from LTS LifeTime Awards as we saw in slide 22. For “Time Period Finish” enter the last day of the term from that same section in LTS.

For “Monthly Chapter 31 Subsistence Rate” most entries will be using the Post-9/11 Subsistence Allowance or P911SA rates so you will need to know the zip code of the school or facility that the Veteran attended during the retro period. You can identify the zip code by using the facility code associated with that award in LTS to look up the facility in WEAMS. If you are not certain about the location and zip code, then contact the school directly to identify the zip code of the location or branch campus that the Veteran actually attended. Click on the link for the BAH Calculator and select the YEAR of the term – in this case 2013, enter the ZIP CODE – in this case 17013, and select the RANK of E-5. When the result is displayed, use the amount for an E-5 with Dependents. This is used for terms where at least one credit was at a brick and mortar facility.

If all courses were completed online, use one half of the BAH National Average for that term. For more information about calculating P9/11 Subsistence Allowance rates at schools in foreign countries or in U.S. Territories, see Attachment A of VA Circular 28-11-01 Revised – that circular is available on the KMP.

You should also remember that prior to August first, 2011 you cannot use P911SA, so you must enter Regular Chapter 31 rates – these rates can be found in the Calculator Tool under the tab “CH31Traditional Sub Allowance.” Also remember that regular Chapter 31 rates change on October first every year, so if a term includes a Chapter 31 rate change, as most typical fall terms would, it must be broken into two separate time periods when using the Calculator Tool.

Once you have entered the rate for the appropriate full-time subsistence allowance for this term in “Monthly CH31 Rate”, then you will enter the appropriate Rate of Pursuit for this term based on the length of the term and the number of credits completed. A course with a grade of W or F cannot be used to calculate Rate of Pursuit. If full-time enter 100%, if three-quarter-time enter 75%, if half-time enter 50%. Once this is entered you should see an amount populate the cell at Column E Line 13 for the amount of subsistence allowance that would have been paid under Chapter 31 for that term.

In Column B enter the Verified Costs for Tuition in line 9 and for Fees in Line 11 based on documentation from the facility. Please note that “Verified Costs” are only those costs that would normally be paid under Chapter 31. Do not include charges for Room and Board or Fees that would not be authorized under Chapter 31. If the Veteran is claiming expenses for Books and Supplies that are greater than what was paid under Chapter 33, then enter the amounts on lines 10 and 12 that the Veteran spent on these items as verified by receipts. If the Veteran is not requesting reimbursement for Books and Supplies or if receipts are equal to or less than what was paid under Chapter 33, leave these lines blank. Also note that if you leave these lines blank, you must also leave them blank in Column D.

In Column C, Line 9 use documentation from the school and in LTS to enter the adjustments to tuition. If any grants or scholarships, other than PELL or SEOG, were applied to tuition then enter that amount here. DO NOT enter amounts of student loans or financial aid not applied directly to tuition. Also, if VA made a Yellow Ribbon payment to the school for this term, enter that amount here. School documentation should also show that the tuition was reduced by a matching amount equal to the VA Yellow Ribbon payment. If that amount was not already deducted from the tuition charges entered in Column B, then it should be entered here in Column C.

In Column D enter the amounts from LTS or SHARE that Chapter 33 paid for tuition in line 9 and fees in line 11. If you entered an amount in Column B for Books and/or Supplies then here in Column D enter the Chapter 33 Book and Supplies payment for this term in line 10 and leave line 12 blank. REMEMBER, if you did not enter anything in Column B on line 10 or 12, then leave those lines blank in Column D, otherwise the Book and Supplies payment will be included as money the Veteran owes back to the VA.

Also, in line 13, enter the total amount that the Veteran received for that term in Chapter 33 monthly housing allowance. This amount can be determined by noting the term dates and expected rate of pay under LTS Lifetime Awards (see Slide \_) then checking the SHARE Payment History Inquiry to identify each full month and partial month payment made for the housing allowance for that term (see Slide \_). For example, if the Veteran was awarded $900.00 per month for a term from January 24th to May 16th as noted in the LTS Lifetime awards section, then in the SHARE Payment History, you should see the actual payments for that term. A payment in February would be for the last week or so in January – maybe $230 or so. March, April and May would show full payments of $900.00 for the months of February, March and April. And a June payment would cover a little more than half of May or about $480 or so. So, you would add each of these and enter the amount in Column D, Line 13 – in this case $3410.00

Once all the data has been entered in the green highlighted cells, you will see the amount of reimbursement owed to the Veteran for this term. If you went directly to the Summary Sheet at this point, you would see those amounts entered, including the BOC code for each item and the system that Finance would use to process the payment to the Veteran – either in Corporate WINRS or as an 06A transaction.

Let’s just quickly add some data in the sheet for Time Period 2 just so you can see how it is automatically added into the Summary Sheet. After we enter the data we can look at the Summary Sheet and we see how the fields have been populated with the data from both Time Period 1 and Time Period 2.

After all the terms for the retro period have been completed, remember to enter the Veteran’s address and ETD at the top of the Summary Sheet, then

Print, sign and date the sheet. Check the box for the system that Chapter 31 payments are currently made to the Veteran – either in BDN or in SAM.

OK, here’s a **special situation** you also need to be aware of. You’ll notice that the Calculator Tool was designed for a maximum of six terms. If the retro period you approved is more than six terms, you must use the following procedures:

Enter the first six terms in the Calculator Tool and print the Summary Sheet.

Open a separate version of the Calculator Tool, enter the remaining terms and print that Summary Sheet. If there are more than twelve terms, you will have to repeat this step again and print another Summary Sheet.

After you have printed the last version of the Summary Sheet (**and you are sure you have a hard copy of each sheet – please check the printer**), then delete the information in the sheet as follows: Highlight the information by left-clicking the mouse in Column B line 10 and while holding down that left click drag the mouse to expand the highlighted area to include lines 10 through 15 in Columns B through H. This will highlight all information for Periods 1 through 6 and the Totals. Once that entire block is highlighted, release the mouse and hit the “Delete” key on your keyboard. This should clear all the highlighted cells.

Now, using the totals from each of the Summary Sheets you printed, enter the grand totals of all sheets in the appropriate lines in Column H. For example, add the total in line 11, Column H for Summary Sheet 1 plus Summary Sheet 2 plus Summary Sheet 3, if needed, and enter the grand total in line 11, Column H of the current Summary Sheet. Continue this process for lines 12 through 15 and also for lines 21, 22, and 23.

Repeat the process of using the mouse to highlight and delete any “time period” information that may be entered in Lines 7 and 8 in Columns B through G. Then enter the start date of the very first term approved for Retro in Line 7 Column H and enter the end date of the very last term approved for Retro in Line 8, Column H.

Make sure the Veteran’s Name, Address, Social Security Number and ETD are entered at the top of the sheet. Print the Sheet, sign and date it and place it on top of the other Summary Sheets that were used to calculate this reimbursement. Follow the same process to provide copies for Finance, VR&E Service and the CER folder, except that there will be multiple sheets for this reimbursement with the final grand total sheet filed on top.

**Slide 28**

Now you’re going to use the numbers generated by the Calculator Tool to finish processing the reimbursement. You need to go to the Finance tab in CORPORATE WINRS and create direct reimbursement transactions for tuition and fees, book or supplies if anything is due to the Veteran for those expenses. REMEMBER not to process any retroactive payments for subsistence allowance in BDN or in SAM if your station is using SAM. The summary sheet from the calculator tool shows any amount that is due to the Veteran for subsistence allowance and that will be paid directly by Finance using an 06A transaction.

So, after you have created the direct reimbursements in CORPORATE WINRS, you must be sure to sign the summary sheet and provide a copy to Finance. If you hand deliver a copy to the Voucher Processor, you should take the time to point out that there are two subtotals. One represents the total of the direct reimbursements you entered in CORPORATE WINRS for tuition, fees, books and supplies. That is the amount in Column H Line 21. The other subtotal in Column H Line 22 is for the total amount of subsistence allowance that is due to the Veteran. That’s the amount that the Voucher Processor will pay using the 06A.

Also, remember that if you processed more than six terms then you will have more than one summary sheet. So you will have to add up the totals for each category from each of the summary sheets, and enter the totals manually in a separate summary sheet. You will turn in that summary sheet on top showing the grand totals due and underneath include copies of each summary sheet that was generated by the calculator tool – and be sure to clearly communicate that to Finance so they know exactly what to pay and they can see where the grand total comes from.

Once you turn in the paper work to Finance, use the FAX Cover Sheet in Attachment 8 of the circular to fax the summary sheet to VR&E Service. If you had processed more than six terms, then fax the summary sheet showing the grand total as well as each of the summary sheets generated by the Calculator Tool. Then file the summary sheet or sheets in the left side of the CER folder. REMEMBER, if this is a case that was closed, you also need to create a CORPORATE WINRS Note documenting the amounts that were approved for each category of reimbursement and the date the summary sheet or sheets were sent to Finance and faxed to VR&E Service.

**Slide 29**

Once you see that Finance has processed their part of the transactions and a payment has been generated to the Veteran, you will use the template in Attachment 7 to create a letter to notify the Veteran. Use the totals from the summary sheet, or sheets, so the Veteran knows what is being reimbursed. Also, file a copy of this letter in the left side of the CER folder. This template is available as an attachment to the circular on the KMP and it can also be loaded as a local letter in CORPORATE WINRS until it can be added permanently to CORPORATE WINRS in a future installation.

**Slide 30**

OK, let’s look back over the entire process - there are a lot of steps that have to be followed. Whether it is an Open or Closed case, the Veteran has to complete some paperwork to request Retroactive Reimbursement and, if appropriate, to elect the Post-9/11 subsistence allowance as well. Discussion about Retroactive Reimbursement should have taken place during the initial evaluation when the VRC was aware that the Veteran had used Chapter 33 for some previous training that might be counted toward an approved goal under Chapter 31. That discussion may have taken place years ago when there was no procedure to process this type of reimbursement. REMEMBER that for Closed cases the only time you have to contact the Veteran is if there is documentation in the CER file or in CORPORATE WINRS that Retro Reimbursement was requested or discussed. Now that procedures have been issued, you need to determine whether the criteria for Retro Reimbursement are met, complete all necessary paperwork including approval by the VR&E Officer, and have the Veteran and/or the school submit any required documentation. If annual costs exceed the VRC’s approval level, then approval for the higher costs must be obtained. Except for Closed cases, retroactive coverage of the previous period of training must be included in the IWRP. For Closed cases, that coverage must be noted in a CORPORATE WINRS Note. The documented information about what was paid under Chapter 33 and what would be covered under Chapter31 is entered in the Calculator Tool. The amounts generated in the Summary Sheet are used to create direct reimbursements in the CORPORATE WINRS Finance tab, except for any amount due for subsistence allowance. Provide a copy of Summary Sheet to Finance, FAX a copy to VR&E Service and file a copy in the CER file. When payment is generated, notify the Veteran using the letter template in Attachment 7.

**Slide 31**

VR&E Service will be using the faxed summaries to track the number and amounts of these types of payments. It is the VR&E Officer’s responsibility to ensure that the guidance is followed accurately. Therefore, these transactions should be included in the Systematic Analysis of Operations that are conducted at each regional office. The VR&E Officer may also want to implement a local training and/or review process, however, that is not being mandated by VR&E Service. Retroactive Reimbursements will be included when the National QA STAR Team conducts reviews of fiscal accuracy. Errors will not be counted prior to December 31st, 2014 which is the date that this training must be completed in TMS.

**Slide 32**

Alright, it’s time to go through some specific questions that we have received or have anticipated. The answers to these questions are based on the guidance provided in the circular and in this training, but we’d like to clarify or reinforce these points. So, the first question is whether Retro Reimbursement can be approved if a Veteran has exhausted Chapter 33 eligibility. The most important part of this answer is that the criteria to approve Retro Reimbursement must be met. So, first we have to have a Veteran who is determined entitled to Chapter 31. If there was a period of previously completed training under Chapter 33, and the Veteran was also eligible and entitled to Chapter 31 during that same period of time, then as long as that training contributes toward the goal of the rehab plan that we are approving under Chapter 31, we can approve Retro Reimbursement for that period. Also, because we are covering the Veteran under Chapter 31 for a period the Vet was also eligible for Chapter 33, then the Vet can elect the Post-9/11 Subsistence Allowance. Chapter 33 was not exhausted during that period of dual eligibility. So that allowance can be used in the retro calculations and it can be paid to the Veteran for the entire time he or she follows the approved rehab plan. However, if at some point the Veteran elects regular subsistence allowance, then tries to re-elect P911SA, that would not be possible because no CH 33 eligibility would exist at the time of election and we would not be processing it as a Retro case at that time.

**Slide 33**

Can a Veteran elect to receive Retroactive Reimbursement without actually receiving a reimbursement check for the difference in benefits? This is an issue that we debated in VA Central Office and here’s how we answered it. We believe that it could be possible for a Veteran to request Retro Reimbursement, but not receive any actual amount of reimbursement. In fact, it might even be possible that the Veteran would owe some money if we processed a Retro for period paid under Chapter 33. First, it’s possible that what the Veteran would have been paid under Chapter 31 is exactly what the Veteran was paid under Chapter 33. If you are thinking that it is unlikely that the total the Vet paid for books and supplies would exactly equal the book stipend from Chapter 33, remember that we don’t even bring that into the calculation unless the Veteran documents that she paid MORE than the Chapter 33 stipend. So, as long as the monthly allowances were the same, the Veteran’s entire tuition and fees was covered by Chapter 33 and/or financial aid, and no request for books and supplies beyond the stipend is requested, then the Calculator Tool would yield a Zero balance.

It’s also possible that the Veteran would owe VA money rather than be reimbursed if her total tuition was covered and the Chapter 33 monthly allowance was greater than what the Veteran could receive under Chapter 31. This could be likely for a period when the Veteran did not qualify for Post-9/11 Subsistence Allowance. So, you have to go through the details with the Veteran and see what the outcome will be before processing a Retro when it looks like the Vet could owe money. It still may be in the Veteran’s best interest though; if it is the only way the Veteran can qualify for Post-9/11 Subsistence Allowance for the rest of the time spent completing the rehab plan.

This was not addressed when we discussed the results of the Calculator Tool, but if we get a negative result for the Total Due to Veteran, meaning that the Veteran owes money to the VA, and the Veteran still wants to go forward with the Retro Reimbursement process, then the VRC must take that Summary Sheet to the Finance Voucher Processor and request that a debt be created for that amount under the Chapter 31 master record with the Collection Indicator “Take All.” In that case, the debt will be collected from future payments of Chapter 31 subsistence allowance.

**Slide 34**

Does the “Election of Retroactive Chapter 31 Benefits” form (Attachment 1) replace the other election form for P911SA? There are a lot of forms or templates introduced in this circular. We already have a form to elect P911SA from Circular 28-11-01 Revised when we first issued guidance about the availability of the new subsistence allowance in August 2011. That original form will still be used when there has been no request for Retro Reimbursement. And the form in Attachment 1 of this circular will be used when P911SA is being requested for a period previously paid under Chapter 33.

**Slide 35**

What happens if the Veteran’s request for Retroactive Reimbursement is not approved? There will, of course, be times when a Veteran requests Retro approval and either the VRC determines that the criteria are not met or the request is not approved by the VR&E Officer. In those cases, the Veteran must be notified in writing and must be provided a copy of the VA Form 4107 – appellate rights. We are not stopping a benefit that had previously been awarded; therefore, a notice of proposed adverse action with a 30 to 60 day due process period is not required. The VRC should also explain the reasons for denying the request in person or by phone, if possible.

**Slide 36**

Can the date of election or date of transfer fall during a school term? This will not normally happen because rules under Chapter 33 require that benefits can only be terminated before the beginning or at the end of a term. This facilitates accounting of benefits paid for tuition and fees. The exception to this rule occurs when a Veteran exhausts Chapter 33 eligibility in the middle of a term. In that case, Chapter 33 will prorate the amount of benefits paid for that term for tuition, fees, book and supplies and the monthly allowance will end on the last day of eligibility. In this case, IF THE CRITERIA FOR RETRO APPROVAL ARE MET, the Veteran should elect Retro under Chapter 31 on the first day of that term, or a previous term during which Chapter 31 eligibility also exists. The Veteran would elect transfer to Chapter 31 on the day following the last date paid under Chapter 33. For that partial term, the VRC would still enter the amounts in the calculator tool that the Veteran was actually paid under Chapter 33 and any outstanding tuition and fees could be paid under Chapter 31 once VA Form 28-1905 was issued to the school.

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In summary, we want to emphasize a few points that were made in the circular and in this training.

The criteria to authorize a retro period under Chapter 33 is the same as for a period under Chapter 30, except that previous payments under Chapter 33 will not be recouped.

A Retroactive Reimbursement is processed differently than Retroactive Induction. It involves calculating the difference in benefits payments and does not require the creation of an overpayment.

Retro reimbursement can be authorized for Veterans previously paid under Chapter 33 who are determined eligible for Chapter 31 for same period – the Veteran must formally elect and request retro reimbursement.

VR&E Officer concurrence is required prior to authorizing Retroactive Reimbursement.

The VRC informs the Veteran, obtains approval, reviews documentation, uses the calculator tool, enters direct reimbursement in CORPORATE WINRS, submits Summary Sheet to Finance, Faxes a copy to VR&E Service, and notifies the Veteran of the payment.

The Veteran makes an election, requests retro reimbursement, and submits supporting documents.

The VR&E Officer gives concurrence, conducts SAO.

Finance processes reimbursement out-of-system with an 06A transaction and in CORPORATE WINRS.

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The STAR Team will be reviewing Retro Reimbursements as part of fiscal accuracy, however, no errors will be called prior to the end of the training period. Training must be completed by December 31st, 2014. Remember to self-certify in TMS using TMS item number VA3870500. Staff may self-assign in TMS by using the search feature and searching for TMS item number VA3870500, or training managers may assign the training to appropriate staff.

Circular 28-15-01 and the accompanying attachments have been posted on the KMP and will be available there until incorporated into the M28R manual.

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If you have further questions or need help with processing a direct reimbursement please contact your VR&E Field Liaison to request assistance. Thank you.