**Procedural Advisory: School Certifying Official (SCO) Guidance for Certifying Chapter 33 Graduate Training**

February 12, 2019

**Background:** In accordance with 38 CFR 21.9750, VA will calculate an individual’s rate of pursuit. Under Chapter 33, a School Certifying Official (SCO) must report the minimum number of credit hours their academic regulations require to be considered full-time, to ensure proper entitlement is charged and appropriate payments are released for any rate of pursuit. (38 CFR 21.9640 and 21.9560, Authority 38 USC 3313) VA will divide the number of credit hours certified by the number of credit hours required to be considered full-time to determine rate of pursuit.

**Issue:** The Long Term Solution (LTS) automatically performs credit hour equivalent calculations for all non-standard terms. These automatic adjustments alter the expected rate of training for students enrolled less than full-time and under values training for terms longer than standard length.

**Procedures:** Until LTS is reprogrammed, Compliance and Liaison will advise School Certifying Officials (SCO) to add the VBA Standard Remarks; “*Graduate non-standard term*” in the remarks with all non-standard length periods certified to off ramp for processing review.

Effective immediately, Veterans Claims Examiners (VCE) will apply workaround procedures to the following scenarios:

* Graduate training certified for terms which are longer (*not shorter*), in length, than a standard term. (new and subsequent enrollments)
* Servicemembers and TOE Spouses of Servicemembers enrolled in graduate training on non-standard terms (new and subsequent enrollments)
* All beneficiary types enrolled in non-standard **terms beginning on or after May 1, 2019**

When credit hours are certified:

* Identify non-standard length terms requiring a work around,
* Change the hour type to “clock-standard”
* Enter the SCO reported full-time measurement in both “full-time” fields
* Enter all other enrollment information as reported, and
* Enter “GraduateNon-Standard Work Around” in the Work Product comments section

**NOTE:** The number for full-time hours certified by the SCO on each enrollment will be used for processing Chapter 33 claims. Do not substitute a “GraduateFull-time” number populated in the Web Enabled Approval Management System (WEAMS).

Standard Term: Standard quarters are 10 to 13 weeks in length and standard semesters are 15 to 19 weeks in length. Enrollment periods, longer or shorter in length are non-standard terms.

Calculate the number of weeks in a term by counting the number of days in the enrollment period (first day through the last day) and dividing by 7. Disregard a remainder of 3 days or less and consider a remainder of 4 days or more a full week.

**When Entitlement Exhausts:**

**Issue:** Under normal circumstances, the LTS will automatically extend entitlement, when entitlement exhausts during a term, to the end of the quarter or semester for eligible individuals. However, the LTS is programmed with different rules for clock hour enrollments. When entitlement exhausts prior to the middle of a term entered as clock hours in the LTS, system rules do not extend benefits.

Additionally, to receive extended benefits, a claimant must not be using transferred entitlement and must not have exhausted 48 months or 81 months of entitlement; when combined with Chapter 35, under two or more programs in accordance with [38 USC 3695](http://uscode.house.gov/view.xhtml?req=(title:38%20section:3695%20edition:prelim)%20OR%20(granuleid:USC-prelim-title38-section3695)&f=treesort&edition=prelim&num=0&jumpTo=true).

Whenever system rules are inadequate or disrupted by a workaround, a VCE must manually apply the proper payment rules.

**Procedures:** Review the date when entitlement exhausts. In addition to reviewing if a Chapter 30 refund is due, verify if the claim has been properly extended. If payments are not extended to the end of the term and an extension is due, manually issue payments to the end of the term for graduate students enrolled in credit hours.

**Questions:** Questions about these procedures should be submitted to the National Training Team.

V/R

Workload Management

Education Service