***1.  When should a VCE use the graduate full-time modifier in WEAMS?***

A VCE must always use the full-time modifier certified on the enrollment by the School Certifying Official (SCO). The graduate full-time modifier in WEAMS should not be used by Claims Processing.

***2.   Who should use the chart on the advisory?***

The chart is intended as a job aid for SCOs, as a reference for Compliance & Liaison and to provide additional background to Claims Processing.

***3.   If there are no remarks on the VA Form 22-1999, should I still apply the work-around?***

The answer is dependent upon the term length:

* No, for all shorter in length, non-standard terms.
* Yes, for all longer in length, non-standard terms.

While a VCE is not expected to calculate a term length for every certified enrollment period, if a VCE does identify a term as non-standard and longer in length than the standard term definition, the work-around should be applied. This will reduce the likelihood of underpaying a claimant due to an omission by the SCO.

***4.   Should a VCE make retroactive corrections to previously reported enrollments?***

These procedures should be applied to new and supplemental enrollments with term begin dates of May 1, 2019, or later. In no instance should we establish an overpayment on earlier enrollments.

NOTE: Any time a claimant is overpaid due to a VCE not applying current procedures, overpayments through the date last paid should be handled as an administrative error.

***5. If a school submits an amended enrollment now with the remarks: “Graduate Non-standard Term” on an enrollment which has been paid without a work-around based upon no remarks previously reported, should a VCE establish an overpayment if applying the work-around generates a debt?***

If the previous enrollment was correctly certified based on the rules in place at the time of certification (meaning the overpayment is due solely to the change in VA’s process), then the overpayment will be considered administrative error. No debt against the student or the school will be collected.

***6. If a school submits an amended enrollment with the remarks: “Graduate Non-standard Term” on an enrollment certified without required remarks after new procedures have been communicated, should a VCE establish an overpayment if applying the work-around generates a debt?***

If the previous enrollment was incorrectly certified based on the rules in place at the time of certification, then the overpayment resulting from amendments reported should be reviewed for potential school liability. A student overpayment may be established only after potential school liability is given consideration with no school liability determined, and VA could not have prevented the initial overpayment. [Refer to M22-4, Part 1, Chapter 7 – School Liability](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001048/content/554400000071640/Part%201%3A%20Chapter%207%20-%20School%20Liability)

NOTE: Potential school liability or the establishment of a student debt should not be considered on certifications submitted to VA before August 1, 2019.