

Section 107 Recertification Q & A

1. Any estimate on potential number of claims?

We do not have an estimated number of claims.

NOTE: These claims will be received and processed over a period of time as they are initiated by the SCOs (School Certifying Officials) and can be submitted between April 29, 2020, and December 31, 2020.

2. Why are SCOs recertifying to the extension campus?

Effective August 1, 2018, Section 107 of Colmery Act requires students be paid housing based on the physical location of where they attend their classes. Previous system functionality did not allow for certification or processing of enrollments at extension campuses. Students who were previously certified as attending a main and/or branch campus, but were actually attending at an extension, must now be recertified to allows us to update our systems and pay the appropriate rate based on the actual location.

3. How is this going to be impacted because of the COVID-19 pandemic? Are schools still going to be submitting these when their schools are closed?

We are working with schools to determine impact because of COVID-19 closures. The recertification period runs through the end of the year, but SCOs are highly encouraged to quickly complete recertifications which may result in lump sum payments to students.

4. How will this impact Section 113 payments already manually issued?

There should be no impact to claims already manually processed under Section 113. New LTS (Long Term Solution) functionality includes Section 113. Training is forthcoming for Section 113 and other sections included in the next LTS deployment.

5. Is capturing VIS (Veterans Information System) when working 107 recerts required?

Yes, if there are changes/updates to VIS. You should check VIS prior to processing the 107 WP. If there are updates, you will need to capture VIS, delete the 107 WP and make the corresponding service changes in a regular CH33 work product. Once completed, you should process the 107 replacements manually, by selecting the add WP107 button.

NOTE: Only 107 Recertification actions should take place within the 107 WP; no other actions should be processed.

6. What happens if after delete/replace, subsequent 1999Bs (99b) are sent in. Are they going to be extension campus specific?

Yes, a 99b must be associated with a 1999 (99). When a term(s) is recertified, we delete the original association (99) and replace with a new association (99). Any changes (99b) following have to be associated with a recertified 99.

7. How does Section 107 impact claims for which a graduate term was processed using grad non-standard workaround and entitlement has exhausted so manual payments were issued to pay remainder of the MHA using FIST/FAUT.

If the original enrollment was processed under grad non-standard workaround, then the replacement enrollments will need to be processed the same. Under the Section 107 workflow, the replacement enrollments must match original enrollments. The tuition, hours, dates, etc. all must match. There is no need to FIST/FAUT any payments.

8. What credit is to be added to the production tracker for processing a 107WP?

The EP credit for the 107 WP is 355.

9. Are multiple WPs allowed for each student with recertifications? Can all recertifications be completed in one WP?

We are instructing SCOs to submit all recertifications for a claimant together. In the event a school does not submit all recertifications together and an additional recertification is received, it can be processed on another 107 WP. Additionally, a claimant can have multiple 107 WPs if they attended different schools.

10. If multiple WPs are required to process, are multiple EP credits taken or one EP credit?

Please follow normal RPO procedures for EP credit when processing multiple work products in LTS.

11. Do these require dual signature? Will there be teams working these in each RO?

There is no dual signature requirement. Management at each RPO will determine how this workload will be distributed.

12. What period of time should we expect to see these types of claims and when will the "Add WP 107" button appear?

The LTS functionality will be deployed on April 11, 2020 and will be available in production on April 13, 2020. Schools are being advised to submit recertifications between April 29, 2020 and December 31, 2020.

13. When we split between two extension campuses will the number of hours and tuition and fees be on the 1999?

Yes, tuition and fees as well as hours taken at each campus will be included on the replacement 1999.

14. Only positive housing payment will be sent to BDN (Benefits Delivery Network). Would we still process any overpayments for schools and books and supplies, if any?

Yes, you will still process. Payments on the original enrollment should match corresponding payments for replacement enrollments, offsetting each other.

15. We do the original 107 and the amended hours at the same time?

Yes. You will have to process the termination of original enrollment and all replacement enrollments in same Work Product. LTS will not let you proceed if the replacement enrollment hours, tuition, dates, etc. do not match.

16. What happens if you select save in error instead of save & add?

You will be taken out of the Enrollment popup back to the Enrollment page. Select the dropdown next to the "In Progress Replacement" enrollment and select "Correction". Resume processing the replacement enrollments by selecting "Save & Add".

17. On the MITC1 letter, we still manually add the 21-4138 VA Form. Will this automatically be added now since the letters will be automatically sent before we can make changes and review?

Yes - This attachment will be added to all MITC 1 letters when the new LTS functionality is deployed.

18. Since pending documents in the VA-ONCE Inbox in LTS will generate an error "cannot auth with pending doc in VA-ONCE", are there other documents or steps needed prior to adding a 107 WP?

Yes. Regular enrollments should be processed prior to processing "Add WP 107". Only 107 enrollments/amendments should appear in the 107 VA Once Inbox.

19. The presentation stated overpayments will be waived. What happens when the following month the payment is lower than what the veteran received in the past? Will the veteran be notified?

Yes, a Section 107 letter will be sent detailing the adjustments as a result of the recertification process.

20. Will the “delete and replace” option be for all VCEs or only those who have single signature?

This functionality (delete and replace) will be available in LTS for every VCE.

21. Will any debts made by changing the facility code to an extension campus be considered admin errors?

Debts created due to change to an extension campus for terms beginning on or after August 1, 2018, through December 1, 2019, will be waived.

22. Will LTS generate payments other than housing changes? If so, what action does VCE take?

LTS will only send positive housing payments to BDN.

23. Will the enrollments be identified as Section 107?

Yes, only Section 107 enrollments will show in the VA Once Inbox under the Section 107 workflow. The “Remarks” section of the Enrollment Certification in TIMS will state “Replacement cert for Colmery Section 107” or something similar.

24. Will some recertifications in the VA-ONCE Inbox go through partial automation or will they all require delete/replace?

Automation will either fully automate the 107WP or delete the entire WP to be generated manually. There will be no partial automation or In-progress WPs for 107. If automation detects an issue and offramps, it will automatically delete the WP.

25. Will POA (Power of Attorney) copies of letters also be automated?

Yes, POA copies will also be automated.

26. What happens if a Section 107 WP is left in progress overnight?

It will impact processing of other work products. If a claimant has a regular enrollment awaiting processing through automation, it will not get processed due to an open 107 WP. If you are unable to complete the 107 WP by end of the day, it must be deleted.

27. If the 107 WP affects the entitlement exhaust date, are the exhaust procedures repeated (DIS 4, LETTERS W/ STEM, ETC) due to exhaust date change?

The 107 WP will only create a Section 107 letter and an applicable COWC letter. Any updates to the exhaust date or non 107 adjustments would need to be processed through a regular work product.

28. Since these are retroactive, if there is a death claim, how are those to be processed?

Please follow current procedures for processing retroactive actions as they relate to death claims.

29. I noted on one of the reductions, the demonstrator checked "do not apply 6CE" box. Can you discuss when we should be sure to check the do not apply 6X?

When a facility code is recertified to more than one facility, 6X rule should be applied to the enrollment(s) as follows:

1. Most hours reduced
2. Highest MHA rate (if same hours reduced)
3. 1st 99B that was entered (if both 1 and 2 are tied)

If any additional hours were also "protected" during prior adjustments, ensure all three mitigating circumstances boxes are checked as necessary to ensure the system continues to pay through reduction or termination date as previously paid.