

**Procedural Advisory:** Section 1010 of Public Law 116-315, Chapter 33 School Certification Requirements - SCO

July 13, 2021

**What has Changed:** On January 5, 2021, Public Law (P.L.) 116-315, Johnny Isakson and David P. Roe, M. D., Veterans Health Care and Benefits Improvement Act of 2020 was signed into law. Section 1010 of this law amends section 3313 of title 38 United States Code (U.S.C.) by adding a new subsection (l) on Verification of Enrollment. This subsection adds new requirements for both schools and beneficiaries using the Post-9/11 GI Bill (chapter 33).

As of August 1, 2021, schools are required to submit an initial enrollment certification for each beneficiary, and a subsequent enrollment certification (verification) after the school's drop-add period. The end of the drop-add period is the last day when a beneficiary is able to withdraw from the course or program of education without penalty. The second certification (verification) should be received no later than 30 days after the school's drop-add period or 60 days from the first day of the enrollment period, whichever occurs first. For schools without a drop-add period, the second enrollment certification (verification) must be received within 60 days from the first day of the enrollment period.

**NOTE:** Use of VA-ONCE to submit all enrollment certifications is HIGHLY encouraged. Once the software solution is provided, schools which submit enrollment certifications through VA-ONCE will discover a cleaner, easier process to meet this requirement.

**School Action Needed:**

- A. **Timing for Submission of Certifications:** For chapter 33 beneficiaries, schools are now required to submit two (2) enrollment certifications for each term to ensure the beneficiary is progressing or has completed their training as certified. School Certifying Officials (SCOs) will do the following:
1. The guidance for submitting an initial enrollment certification has not changed. The first enrollment certification should be submitted to VA after a beneficiary enrolls and up to 180 days before the start of the term. This initial enrollment does not have to reflect current tuition and fees. The second enrollment certification (meeting the qualifications in paragraph 2) will suffice to ensuring the correct tuition and fees payment is released to the school.
  2. The second enrollment certification (verification) should be submitted after the school's drop-add period, but no later than 30 days after the end of the school's drop-add period. For schools that do not have a drop-add period, the second enrollment certification (verification) should be submitted no less than 30 and no more than 60 days after the term begins. The 60-day maximum time limit applies to terms even if they are completed before that date.

**NOTE:** This requirement is only for schools approved as Institutions of Higher Learning or Non-College Degree facilities. At this time, there are no changes for On-the-job training, apprenticeship, flight, and correspondence training establishments, to the current process for submitting enrollment certifications.

**B. Two (2) Certification Requirement:** VA is currently developing a software solution that will simplify the two (2) certification process. Until the development of that system, a second enrollment certification must be submitted using one of the following methods:

1. **Dual Certifications.** Many schools use a practice of submitting initial enrollment certification with \$0.00 in the tuition and fees field(s). After the drop-add period, the tuition and fees are certified by amending the term to add the tuition and fees amount. This is called **dual certification**. If the amended (tuition and fees only) certification is submitted within the time limits explained above, this will meet the two (2) certification requirements.
2. **Enrollment Changes.** If a beneficiary makes changes to their enrollment during the drop-add period or within the first 30 days of the term, the school should follow current guidance to report changes to VA. The submission of a change to an enrollment period if reported after the drop-add period will suffice as the second certification and meet the two (2) certification requirements when received within established the time limit.
3. **Unchanged Certifications.** If the school has no changes to make to the enrollment or tuition and fees for a term, a second enrollment certification is still mandated. In VA-ONCE, this should be done by amending the enrollment, making no changes, and submitting the term. Comments or remarks should be avoided (unless necessary) on these “unchanged” amendments to allow the greatest likelihood of automation by VA. Schools which have not chosen to use VA-ONCE must still submit a second certification, marked “no changes” in remarks.
4. **Retroactive Certifications.** When schools are submitting enrollment certifications for terms that are already completed, the two (2) certification requirements remain. An amended term should be submitted on the next day to maximize automation, as described for “unchanged” certifications above.
5. **Paper Certifications.** If a school is unable to certify enrollments using VA-ONCE, the SCO should submit two enrollment certifications (VA Form 22-1999). The first should be sent to VA when the beneficiary enrolls. If there are no changes after the drop-add period, schools should submit a duplicate enrollment certification with remarks stating: “No Change/Verification Only” within the time limits stated in section A, 2. If there are changes to the original enrollment, a Notice of Change in Student Status (VA Form 22-1999b) should be reported after the drop-add period which will suffice for the second certification.

**Questions:** Any questions should be addressed to the [Procedures Team](#).

V/R  
Procedures Team