

Barrett Bogue:

I'm Barrett Bogue. I'm the outreach development team leader at the Department of Veterans Affairs. I came here today to really talk about the Post-9/11 GI Bill, to talk about some of the recent legislative changes that took place. We're also gonna kind of delve into the debt and overpayment issue, which we've gotten a lot of feedback on, and then, at the end of the presentation, there will be time, and I'm gonna try and leave as much time as I can, to do questions and answers. One favor I would ask of you is this session is being recorded to be used, I believe, on the website at a later date. Yesterday, I had a lot of people come up to me and ask questions after the event, and I kind of thought in the back of my head, "It would have been really helpful if that question had been asked in front of everybody else." So, I would encourage you, if you think you have a question that only pertains to you, it might pertain to a lot more people.

So, I would encourage you to please ask that question during the Q&A at the end of my presentation. If not, no problem; I will make myself available at the end of the presentation. I will stay here, and we can move out into the hallway, and I will stay as long as I need to to answer your questions and your inquiries. Finally, I don't know everything, okay? And I'm not afraid to say I don't know, and if I don't know the answer to your question, at the end of the presentation, my e-mail address is up there, as well as my phone number, which is also kind of scary. But e-mail is the best way to get a hold of me, and if I can't answer your question, please e-mail me and ask it again, and if you have any follow-up questions to today's session, please e-mail me, as well.

So, what I'm gonna do right now, I'm almost certain that all of you in some form or fashion are familiar with the Post-9/11 GI Bill, so we're gonna kind of go into the very basics of it, a very brief overview. I'm gonna talk about the legislative changes _____ go into the debt overpayment issues, and then there was this new program, this new education benefit program that Congress passed and the president signed into law approximately two weeks ago, so recently that I couldn't even update the Power Point with it, and I am gonna talk about that, and you can learn more information about it on our website, okay?

So, very basic. The Post-9/11 GI Bill provides educational assistance to those who serve a minimum aggregate 90 days of active duty service. Now, many men and women who are on active duty serve three, four years, and so the 90 days really applies to those who are in the reserves, like myself. I am a product of the GI Bill. I did serve in Iraq with the Marine Corps,

and I got to use the old REAP program, Chapter 1607, and I missed the Post-9/11 GI Bill by about that much, and I ran out of entitlement, but that's okay. I used it to get my degree, and so here I am standing in front of you as a product of the GI Bill, and it is a fantastic and is a great program. How is the GI Bill structured? Well, again, I mentioned about being a reservist. The program is structured based on three different payment types and then benefit tiers. So, the payment types are a payment for tuition and fees, a monthly housing allowance, and a books and supplies stipend. How much you get is really based on how much active duty time you served, and it's kind of proportional.

So, if you serve between six and nine months, you're gonna be eligible at the 40 percent benefit level, and then 100 percent if you serve three years or more. It expires 15 years after your last qualifying period of active duty service. Now, one thing I want to point out there is if you're a reservist and you go back on active duty, that 15-year period starts over again from when you're released. So, if you're on active duty right now and then you get off and you never go back in, you've got 15 years. But let's say you're on active duty and you get out, you join the reserves and your unit gets activated, well that 15-year window starts over again from the day of your last – from your day of release from active duty service. Where can you use the Post-9/11 GI Bill? Any program or institution of higher learning approved for the Montgomery GI Bill, the old Chapter 30 program. We have approximately 5,000 institutions that are approved for benefits, and, as I'm certain, all of yours are approved.

One of the more recent legislative changes that took place last January but went into effect at the beginning of this fall semester, and there were several of them, which we'll get into, was Congress changed the way we calculate tuition and fees. Whereas before, we had about 51, 52 different tuition and fee rates for every state, and it was the highest in-state maximum tuition and fee rate, and it ended up being a difficult thing as far as from a processing point of view to do that and to process that for all the different states. But, more importantly, it was very difficult for veterans to try and plan out their education career and having to do different calculations for different states. So, what Congress did is they simplified it and they said, "VA starting this past August 1 is gonna pay 100 percent in-state tuition fees for public schools." Now, I did not say undergrad. All that matters is that it's a public in-state school. So, there are instances, and I do have friends who are getting their graduate degrees and it's being completely paid for, so what really matter is that it's a public in-state school.

Another change that happened with the Post-9/11 GI Bill that was effective August 1 was Congress implemented a national tuition fee cap for those going to a private and foreign school. This year, academic year 10-11, that cap is \$17,500.00. I can't remember if it's gonna be a COLA or another kind of adjustment, but that cap is gonna be raised every year. But, for this year, it's at \$17,500.00. That's a pot of money that they can pull from for the academic year until they run out. Exception. Okay, kind of getting to the meat right here. Congress passed another change to the program in August where there were some individuals who were enrolled in a private school who would have been subjected to the \$17,500.00 cap, and received less in GI Bill payments this year as they did last year. So, Congress made a grandfather clause for them, and for those students in this state who are enrolled in those institutions in academic year 09-10, they're able to be paid under the old way that we determined the benefit amount back then, and that's gonna run through 2014.

The last bullet is something that I want to emphasize with all of you all. Really take advantage of the opportunity we have here right now. We definitely had a rough go at it when we first started paying out the Post-9/11 GI Bill, and part of that issue was we did not do a good job of communicating and educating our beneficiaries and those we serve about how the debt process works and how you could be liable for a tuition and fee payment. So, what we're really trying to do now, and where I need your help, is to reinforce the fact that this is an entitlement program for these students, and that the tuition and fee payment, even though the student never really sees it, the tuition and fee payment is paid to the school on their behalf. It's paid to the school on their behalf, and that's something that we're trying to emphasize in all our presentations and when we communicate to people, and we communicate to our beneficiaries is that, "No, you don't directly see that tuition and fee payment like you do the monthly housing allowance. However, by law, we pay that amount to the school on your behalf, and so if you do something, if you reduce your credit hours, if you do anything where a debt is created for tuition and fees, you're gonna be liable for that."

There's a monthly housing allowance. It's paid in arrears. So, when I'm going to school in October, if I got for the full month of October, I'll get a housing allowance paid at the beginning of November. It's based on the basic allowance for housing rate for an E-5 with dependents at the ZIP code the school is located. You get up to \$1,000.00 a month – excuse me, \$1,000.00 a year for a

books and supplies stipend, 36 months of benefits, or 36 months of entitlement, as we call it, and finally, one of the more popular options, which we hear a lot about and maybe you all hear a lot about, is the ability to transfer. I see some heads nodding. So, one of the things I want to emphasize to you all, and we see this and we hear this, is people want to know why, "VA won't let me transfer my benefit." Well, we don't really have a say in that.

Transferability is a retention program for the Department of Defense, and it is up to every service component to approve or disapprove a service member to transfer his or her benefits to his or her spouse or dependents.

So, generally speaking, if a service member has been in the military for six years and he or she agrees to sign on for four, they're able to transfer that benefit, and, at that point, that's where we step in, and we treat that child or we treat that wife or that husband as if he or she were the veteran in our eyes and in our system. So, one thing I would emphasize again is that when it comes to determining who is eligible to transfer the benefit, VA doesn't do that. That application process goes through the Department of Defense and it's for members who are in the armed forces.

Yellow Ribbon, an extremely popular and successful program right now. I believe this academic year, we had about close to 2,000 institutions who were participating, and what it does is it opens up even more educational opportunities for our veterans, where if there's an unmet need, if there's a tuition fee amount that's unmet because of the \$17,500.00 cap, there's a mechanism by which the school and VA can enter into what's called a Yellow Ribbon agreement, and where that difference is, VA will pay that up to half the difference. I've got a friend, **Tony Rango** – he's gonna love the fact that I'm talking about him, and that it's going on the Web – he is going to George Washington University. Now, this school was probably one of the more out-of-reach schools for veterans, at least three or four years ago, but thanks to the Yellow Ribbon Program, he's getting a master's degree right now. It's approximately \$40,000.00, \$45,000.00 a year, and it's all paid for thanks to the Post-9/11 GI Bill and the Yellow Ribbon Program. So, if your school is not participating in Yellow Ribbon, I would very much encourage you to go to your institutional leaders and talk to them about, "Hey, we really need to consider participating in Yellow Ribbon." We do accept applications. There should be an announcement on our website soon, if not in December, in January, on when we're gonna begin accepting applications for the 11-12 academic year.

The most – I was about to say the most recent legislative change, but that's not true. The most significant legislative change to the Post-9/11 GI Bill happened last January and went into effect in August and October. I've talked a little bit about how we pay the tuition and fees. The second bullet is something I want to spend a little time on with you all because I need your help. Now, break or interval pay, those are terms we use interchangeably. I've heard it called gap pay. For those of you who don't know what that is, an example would be if I'm the student enrolled in a fall term and my semester ends December 15, and I'm gonna go to school in the spring in January, and that semester doesn't start until the 10th, well, beforehand, we could pay the full benefit amount for the month of December and through January because of that interval or that break in between terms, okay? That no longer exists, and it is an extremely controversial move on behalf of the Post-9/11 GI Bill, and so here's where I need your help, okay?

As the outreach development team leader, we're trying to communicate a message out there, we're trying to raise awareness about the Post-9/11 GI Bill, and, in addition, we're trying to make students aware of these changes and how it could impact them. December is coming up, and I know that it's gonna be a very, very difficult thing for some of these students, who maybe in their mind they were expecting a full month of December for the housing allowance, which, because it's paid in arrears, it'll be paid in January. Well, for some of these students, they might be surprised in January that they only get a week or two weeks worth of housing allowance because they only went to two weeks worth of school in December. So, I need you to help us, if you can, raise awareness about the fact that this change is in place and they should not be expecting that money. They should not be expecting that.

For the third bullet, this is another significant change. Some of the feedback that we got for the original Post-9/11 GI Bill back in 2009 when we started paying benefits was that students who were enrolled solely in online distance learning courses were not eligible for a housing allowance. Well, effective October 1, they are eligible for a housing allowance, and the key thing there is enrolled solely in an online distance learning program. In that instance, they're not gonna be paid like somebody who's enrolled at what we call a traditional brick-and-mortar school. What they're gonna receive is half the national average of the BAH allowance, so it's a flat amount, and I believe it's around \$675.00 a month for students who are enrolled solely in distance learning courses. Now, you

take one credit hour, two or three credit hours at a traditional brick-and-mortar school, you'll qualify for I guess we'll call it a normal BAH or monthly housing allowance.

Congress increased the types of programs that are eligible for the Post-9/11 GI Bill. If any of you ever worked at the Montgomery GI Bill, you remember that programs like on-the-job training, apprenticeship, flight correspondence and non-college degree programs were eligible for MGIB, and when Congress passed the Post-9/11 GI Bill and we started paying it, they weren't eligible. Well, they went back and fixed that and now they are eligible for the Post-9/11 GI Bill effective October 1. More inclusive for Guard members: originally, if you served in the National Guard and you were a National Guard man or woman, and you served on active duty under what are called Title 32 orders, and a majority of people serve under Title 10 orders, but if you're familiar with that, they served under Title 32 orders, and those were not eligible for the Post-9/11 GI Bill.

So, what Congress did is they said, "Okay, we're gonna make people who served under Title 32 orders also eligible for the Post-9/11 GI Bill," but in addition to that they said, "We're gonna include that change as if it were in the original version of the bill." So, what that means is if I were a National Guard man or woman, and I served on active duty under Title 32 orders and I went to school in 2009, I'm actually eligible to be reimbursed by VA through the Post-9/11 GI Bill. So, it's retroactive to 2009, August 1, 2009, when we first started paying benefits. A couple more things: it allows reimbursement for multiple licensure and certification tests, national exams, whereby before I believe it was only one; it allows students on active duty to receive a books and supplies stipend.

Okay. This is another area in which we're trying to raise awareness and do a better job of communicating, and we get a lot of feedback on the confusion over how to report tuition and fees to VA, so I'd like to spend a little time on that, if I could. Report net cost, the tuition and fees after any waiver or scholarship is applied. You exclude loans and Title IX, and here's one thing I want to emphasize: you exclude anything not designated for the sole purpose of reducing a student's tuition and fee costs, and that's key, and that's where I see a lot of confusion in some of the feedback that I get, and people ask me, "Well, what about this? It doesn't say it's for tuition and fees." If it's not – underline this, highlight it, circle it, do what you can – for the sole purpose of reducing a student's tuition and fee costs. So, exclude anything not designated

for the sole purpose of reducing a student's tuition and fee costs. Report the tuition and fees charged to the student after deducting any amounts paid with federal funds, also excluding financial aid programs, Title IV funds, and then below, I've got some examples of some non-Title IV federal funds.

Okay. Let's get into the real popular stuff, all right? Debts and overpayments: I believe we've paid out about \$11 billion for the Post-9/11 GI Bill, and as our director says, once you start talking about billions with a B, you start talking about real money, and what happened on our end is we did not do a very good job at communicating the debt process and the overpayment process to some of these students. So, what we had was we had a lot of students who went into school or they dropped out or they reduced their credit hours, and because we were paying these large amounts for tuition and fees, which we had never paid schools before – we had never paid schools on behalf of the student before – because we were paying these large amounts for tuition and fees, we started seeing large debts, and that created and has created a very challenging environment for us, which we are trying to improve and work through. And that's what I want your feedback on today, is some of your ideas on ways in which we can improve that, ways in which we are doing a good job and ways in which we are not doing a good job and which we can work better.

Nine times out of ten, when I'm looking at a file and somebody wants to know, "Why did my housing allowance get deducted? Why am I liable for this tuition and fee payment? What happened?" it's this first bullet: the majority of debts related to education benefits are a result of the veteran/dependent changing their enrollment status during a school term for which benefits have already been paid. That was a very, very big challenge at the beginning of the program, and we have tried to work through that, and one of the positive feedbacks that I've gotten is a change in how we process enrollment certifications. For those of you who are familiar, we can't take an action on a person or a claim or a payment until the school actually submits an enrollment certification to VA and says, "This person is at my school, he or she is taking this many credit hours, and they're being charged this much for tuition and fees."

Well, what we did two years ago, I think it was two years ago – if not, it was this summer – we told schools in July, "If you have a student that you know is gonna be starting school in the fall, you can go ahead and submit an enrollment certification to VA saying, 'This student is gonna be enrolled at our school.' You can report

the credit hours and you can put zero dollars next to the tuition and fee amount reported." What that does on our end is it starts the claim process for us, so that information gets put into our IT system, and the housing allowance and the books and supplies stipend payments are already programmed in there so that when a student starts school in August or September, that information is already in there.

Once that student has started school and, either on your end or our end, the tuition and fee amount has been determined and you know what that is, you can submit what's called a **1999 bravo**, an amended enrollment certification saying, "Okay, he's now enrolled in this school. We now know how much he's being charged for tuition and fees," and you can report that to VA. Upon that point, we'll take that and we'll process that payment and send it to your school, and what I've heard is that process has worked very, very well. Before, schools were unable to do that, but now I would highly encourage you, you can submit those enrollment certifications very early in the summer with a zero dollar tuition and fee amount.

Another thing, and this comes from my experience with the GI Bill, I got a letter from the VA saying I had dropped a course and I owed \$69.00, and I did not understand why. I was so angry. I thought the VA was just trying to do me wrong, and I could not understand why, and so I'd ask each of you, when you're talking to your students and you're counseling them, talk to them about the liability that they have with the tuition and fee payment, and to really, really think about the number of credit hours that they're gonna be taking. A lot of times, I see students who take – they'll take 12 hours and then they drop a class, and now they drop below fulltime. Now, that payment amount for the tuition and fees and the housing allowance has changed, and we might have already processed that payment. They might have already received the money.

So, for the second bullet, debts are automatically when VA processes an amended award based on information received from the school, all that's really saying is that there's really no manual process for it on our end. When we receive that information, that amended enrollment cert from the school, it gets entered into the system automatically, especially if you go through VA-ONCE. I'm sure all of you, or most of you are familiar with that program, and the IT processing system spits out that debt. One thing we did change policy-wise, and you'll see in the third bullet, is originally, for the old rules, veterans were able to repay debts but only within

that academic year, and so what we've done is they can establish a repayment agreement that extend out for one year, where previously we had a policy offsetting the entire amount from funds available during the veteran's current school enrollment term. What was happening is the debt amounts were being deducted from the outgoing monthly housing allowance payments in the next semester, and that really put students in a bind. So, we do allow them to extend that debt amount and that repayment plan for a year, but we do still collect on the housing allowance amount if they don't take that option.

Okay, of interest to you all, I've got I believe it's six or seven bullets, when is a debt created against a school? If the student never attended classes they were certified for regardless of the reason for non-attendance. I have seen that. The student completely withdraws on or before the first day of the term. That's also very common. The school receives payment for the wrong student. I honestly don't know how that's possible, but hey, if it's there, it's probably happened before, okay? I have not seen that. The school received a duplicate payment. The school submits an amended enrollment certification and reported reduced tuition and fees. That's very common. The student dies during the term. That's unfortunate, but I have also seen that, as well

VA issued payment greater than what was certified. I find that hard to believe, but some of the feedback I've gotten is that, "Yes, I got more money than what I certified through VA-ONCE," or **what we sent**, and so I need to hear more of that, if that's the case, and what exactly happened so we can kind of look into that and make some improvements, **if needed**. In all other instances, the school should refund the money to the students in accordance with their policies. Again, that goes back to educating the students about the fact that, "VA has made this payment to the school, yes, but they made it on your behalf, so you're responsible for it." Debt collection practices in VBA. This is a tough subject to talk about, I am not gonna lie. I mean it's a little intimidating to be up here in front of you all and have **an overflow** crowd and talking about debt collection for veterans, okay? We are trying to improve that process.

We are definitely sensitive to the fact that nobody wants to be collecting debt from veterans, so what we want to try and do is make it as simplified and centralized as possible. Current practices center around collecting overpayment of benefits from veterans or their dependents. I touched on this. It's the first time we've paid on behalf of a veteran to a school where we need to collect debt

from the school, and then another key thing, beforehand, we paid benefits in arrears, especially for Chapter 30, and in some instances, the veterans were able to self-certify their own enrollment. I remember going online and certifying once a month that I was still enrolled in school. That is planned for the Post-9/11 GI Bill, but the changes in the law have required us to make additional IT changes, so what it's doing is it's pushing that back, but self-certification of enrollment by veterans is something that we are going to do in the long run.

So, what are we doing at the Debt Management Center right now? It's being reconfigured to produce multiple debts against a school, which can be sent to the Debt Management Center. We're developing accounts receivable reports by individual for schools to help reconcile the reason for the debt, and some of the feedback we've gotten, and I'm sure you'll share it today, is there's a lot of confusion over, "How do I know how much money to send back to the VA? How do I know who this is for? What's going on between the interchange of money?" What we're trying to do is to develop a way where we can better identify that through the Debt Management Center. Currently, debt processing functions, if we get a payment back from the school and we can't identify the reason for that payment or the reprocessing of that payment, it's sent to one of our four regional processing offices, and that will eventually be consolidated into one regional processing office. So, what we want to do is have one RPO be the single source for the debt collection process, as well as the Debt Management Center.

Future changes. Notification letters will go out much quicker based on system changes notifying DMC of a debt. This is one area that we can certainly improve on. I believe right now it takes between 60 and 90 days to send out a debt collection letter, and really that's a very difficult position to be putting an individual and a school in right now. So, what we're trying to do is improve our IT system so that happens much, much faster so that either a school or a student or both are notified of the debt. All school checks will be sent to DMC for processing. Those that cannot be applied will be sent to the one RPO for research and processing. For the third bullet, again, I ask you to be patient. These kinds of changes are going through concurrence right now, through senior leadership at VA. I suspect, and I hope that they are going to happen and, when they do happen, what we're gonna do is we're gonna put that information out on our website, we're gonna put it on the Facebook page. If I remember correctly, when the law changed in January, we sent a letter out to all the institutions who were in our system to talk about all the recent legislative changes

and whatnot. Some of you might have even seen that letter. We're gonna do the same thing for this, as well, so when this stuff happens and takes place, we'll also send out a list of all the debt collection changes and practices that we've made at VBA, and we do anticipate those changes happening before the end of the year.

I've said it several times already, but we definitely need your help. I've said patience. Maybe you guys are getting a little frustrated at me saying that. It's okay. You can take it out on me. What we do see as some of the best practices, and some of the feedback I got yesterday, is having your school certifying official, the person responsible for sending that enrollment certification, located in the bursar's office is very helpful. It's very, very helpful. In fact, a lot of the schools that I've talked to who don't seem to have some of the issues or the problems or the challenges that we've seen and we've heard about are because they've taken their school certifying official and moved them from the registrar's office, which is where my school's certifying official was, and moved him or her into the bursar's office.

Once the announcement comes out, the new consolidating and debt processing procedures are in place, we ask that you do not send any debt money to VA until you get a letter from DMC, and on that letter is gonna be a tear-off stub, which you'll be able to use to identify the amount, and the student and the student's information, and send it back to VA, and that's gonna help us process that debt on behalf of that student much, much faster. Okay. My team and I do manage the website and the Facebook page. I would encourage you to become a fan. Hey, I'll tell you what, people on Facebook, on our Facebook page, in particular, are not afraid to share their opinion.

[Laughter]

Yeah. Yeah, we do see it. We do monitor it. I'm telling you, we take some of that stuff to heart. We really do. It is a very, very powerful communication and customer service tool for us. Our website, and I'm sorry I don't have it on the Power Point, is gibill.va.gov. Our Facebook address, the Facebook URL is [Facebook.com/gibilleducation](https://www.facebook.com/gibilleducation). One word. Everybody on our Facebook page knows about the loss of break pay, and they sure express their feelings on that. The Facebook URL, again, is [Facebook.com/gibilleducation](https://www.facebook.com/gibilleducation). One word, and the GI Bill web address is gibill.va.gov. That's gibill.va.gov.

There's a couple more things I want to touch on that I kind of

missed yesterday that I want to take advantage of with you all is we put out what's called the School Certifying Official Handbook at the beginning of the academic year, and I call it the Bible of claims processing. For some of those really difficult and challenging questions about how to calculate the tuition and fee amounts, how to use VA-ONCE, are in this document on our website, and if you haven't seen that, I would encourage you to go to our website. If you go to our website and you click on School Resources, there's a link right in the middle. It says School Resources, and that's a page dedicated to you all, and it's a page that we're continuously trying to improve to provide information specifically for you all, and on that is the School Certifying Official Handbook. It's a 105-page PDF document. It's a very big file. I couldn't e-mail the thing, but I would very much encourage you to go on there and read it if you have any questions about claims processing with VA.

It is a comprehensive, single nationwide, worldwide processing policy handbook that VA puts out, okay? So, whereas before, we saw each RPO started having – they kind of delineated a little bit from some of the policies that we had over in central office, so what we did is we took it all, we brought all four regional processing offices in, and we said, "We're gonna create a national handbook for our school certifying officials so that all the information is the same across the board for everybody." We've gotten a lot of positive feedback on that. I will say that our intention is to update that handbook on a yearly basis, especially with the recent changes in the law, and with any kind of policy or procedural changes at VA, keeping that handbook current is something that we are going to do.

Lastly, before we start questions, Congress created a new education benefit program about two weeks ago. It happened so quickly that I couldn't get it loaded up into the Power Point. I just wanted to simply make you all aware about this new program. It was passed with the Veterans Opportunity to Work Act, or VOW, V-O-W, Veterans Opportunity to Work Act. I believe it involved tax credits for employers who hire veterans, and there was a little part in there about education benefits for unemployed veterans. What this program is gonna do is provide 12 months of benefits for veterans who are unemployed. Now, there's a lot of little particulars on how to qualify for this program that I really don't want to go into. It'll muddy up the waters a little bit. It's a program that's separate from the Post-9/11 GI Bill, so let's get that out there.

It's separate from the Post-9/11 GI Bill, and it's a program that we're gonna run jointly with the Department of Labor. We just met with Labor last week, so it's that new. So, unfortunately, I don't have a lot of information on it, but I would encourage you to go to our website, gibill.va.gov, and in the center – well, it's not no here, but in the center, we have an announcement feed, and in that feed – there it is, Announcements. In that feed, I believe the most recent announcement is about the Veterans Opportunity to Work Act, or the new benefit program. I gotta be honest with you, I don't even know what we're gonna call this thing. Right now, we're calling it VOW, so I'll just keep calling it that, but the name could change.

There's my phone number and e-mail address, and like I stressed at the beginning, please e-mail me with your questions, your comments, any kind of particular situation that you need help with. E-mail is the best way to get a hold of me. Sometimes I'm in my office, sometimes I'm not; if you call, please leave a message and tell me the best way to get a hold of you. So, what I want to do right now, I know some people might migrate out, but what I'd like to do is set aside the rest of this time to take questions, and then, when we're over, what I'll do is I'll move outside if we want to talk one-on-one about any kind of particular question. So, if you have a question, I would encourage you to line up at the mic and ask your question, if anybody has a question.

Audience: Is this working?

Barrett Bogue: Yes.

Audience: I would like to see more flexibility for fulltime students. I know that when you're a certifying office, you certify from the beginning of the class date to the end of the class date, and a lot of schools that have medical programs and clinicals, and things like that, a student is originally certified for 12 hours of school. But a lot of times during the semester, they may take more, and then less at the end of the semester, and their housing allowance is affected by it, where they're actually covering 12 hours of credits over that course of the semester, but because of the start and end date of their classes, their basic housing allowance gets reduced by the end of the semester, and they don't increase it for the time that they're full. Is that a question that makes sense to you?

Barrett Bogue: Well, it's a comment –

Audience: Yeah, it's a comment.

Barrett Bogue: – and it definitely makes sense to me. I have heard that, and I don't have a solution to it. I can say that basically we really are tied to what you guys report, and we're also tied to what the law requires us to do, and so whenever there's an enrollment change sent in, this IT system that we have, it's programmed to do a certain thing, and that's one of those things. So, if you'd like, you can definitely send that suggestion to me in an e-mail, and I can send it forward and say, "Hey, look. What kind of a change would this take if we could do it, or would we even consider that?" I'd be happy to do that.

Audience: Okay.

Barrett Bogue: Yes, ma'am?

Audience: Hi. I'm from a public school, and last year our out-of-state students were paid in full because the highest public tuition was higher than what our institution's out-of-state tuition costs were. Now, with the new changes this year, that they can only pay the highest in-state tuition, that's for our institution, correct?

Barrett Bogue: Well, it's not necessarily based on overall institutions. What it simply is is if you're a public school, it's whatever the in-state rate is for your students.

Audience: Okay, so our –

Barrett Bogue: Does that –

Audience: – out-of-state students are getting paid less this year than what they were getting last year?

Barrett Bogue: That's right.

Audience: Are we supposed to be reporting on VA-ONCE what their actual tuition charges are as an out-of-state student, or are we supposed to be reporting what the in-state charge is for that student if they were an in-state student?

Barrett Bogue: Okay, the question is –

Audience: Say they're being charged \$4,600.00 for an out-of-state tuition charge –

Barrett Bogue: – right.

Audience: – for fulltime, but the maximum in-state charge was \$2,600.00. Which amount do you want us to report on VA-ONCE?

Barrett Bogue: I believe it's whatever they're being charged. It's whatever they're being charged, the actual amount.

Audience: Okay, then there's not a question on VA-ONCE for our reporting that asks, "Is that charge an out-of-state or an in-state charge?"

Barrett Bogue: Okay, can you – and I'm not –

Audience: Say we report –

Barrett Bogue: – I'm not very familiar with VA-ONCE, I really am not, and maybe you all can help me. When it comes to an out-of-state student and reporting the actual charge, is there a way in VA-ONCE to identify that it's out-of-state, or is there a –

Audience: *[Inaudible comment]*.

Barrett Bogue: – no.

Audience: *[Inaudible comment]*

Barrett Bogue: Right, it's just tuition and fees?

Audience: *[Inaudible comment]*

Barrett Bogue: Right, right.

Audience: *[Inaudible comment]*

Barrett Bogue: Right, right –

Audience: *[Inaudible comment]*

Barrett Bogue: – or if they participate in Yellow Ribbon. You had to report that amount, too.

Audience: *[Inaudible comment]*

Barrett Bogue: Right, right. Okay. I'll tell you what, why don't we talk offline about this, because –

Audience: Okay.

Barrett Bogue: – it sounds like you are very concerned about it. So, if you want to e-mail me, or if you don't –

Audience: Sure.

Barrett Bogue: – mind waiting, I'd be happy to talk to you outside about it, okay?

Audience: Okay, I'll send an e-mail. Thank you.

Barrett Bogue: Okay. Thank you.

Audience: I just have a quick question about – well, I guess it's not really a question, it's more of a statement – well, it's a question/statement – about transfer students and students who maybe were at another institution but now are transferring into your institution and they've used some of their benefits. Does the VA have any plans on a better way that they can communicate that information to the schools? Because right now, you might have a student, especially now that we have a cap, who used some of their benefits, maybe they were at a private school and used all of their Post-9/11 benefits, and now they're coming to your school and you're certifying them, and you're not gonna find out that some of that was used until now you get a check for \$42.00 or whatever the –

Barrett Bogue: I see.

Audience: – situation was.

Barrett Bogue: I see.

Audience: Actually, it was something that I brought up a couple of years ago – well, it was about two years ago – in Pittsburgh about maybe putting something in place where that entitlement information maybe on VA-ONCE can be in a place where certifying officials can see it, and the answer was, "Well, we have to be concerned about their information and maintaining that information." Well, the same way the Department of Education does it with all of us with the FAFSA form, rather than reinventing the wheel, maybe the way that we do it with FAFSA, maybe doing it that way, also.

Barrett Bogue: How is it done with FAFSA?

Audience: Well, if you have a transfer student or a student who completes the FAFSA form, and now they have that information, what they can do is put in a school code, and we all have the same thing with the VA –

Barrett Bogue: Right.

Audience: – we all have codes, maybe doing it that way, where now that information can be transferred to the other school so we know how much of their entitlement was used at another school, what their percentage is, because all of us know dealing with VA students, you don't always get that copy of that certificate –

Barrett Bogue: Oh, yeah.

Audience: – or that type of thing.

Barrett Bogue: Yeah.

Audience: So, that was –

Barrett Bogue: That's a good idea, and a similar comment was made yesterday about more robust reporting capability through VA-ONCE –

Audience: Yes.

Barrett Bogue: – and I'm definitely reading you loud and clear on that.

Audience: Okay, that was my first question/comment, and then you also brought up something, and I was sitting over here nodding my head vigorously about overpayments.

Barrett Bogue: Yes.

Audience: I can think of a student, his name right now in my head, _____ a situation where we received an overpayment. We received the Post – he was 100 percent, and let's say his tuition was \$5,000.00, so with the calculation, he was gonna get \$4,000.00, and then it was – he should have got \$4,000.00 in Post-9/11, and then \$500.00 Yellow Ribbon from the school and \$500.00 from the VA, and then we got a check for \$5,000.00 in Post-9/11 money. So, we called the school – I'm just using that amount as an example, but it really happened. So, we called the VA and they say, "Oh yeah, that's right. That should have been Yellow Ribbon money. Give the student the money before debts were put on the school." So, it was just a situation where that did happen and it does, so I just wanted to pass it on to you.

Barrett Bogue: Thank you.

Audience: Oh, and one more thing, and I'll stop, I promise. I just have a question about where the – I don't see them on the website anymore, the **Super SCO** videos.

Barrett Bogue: Yeah –

Audience: Are they coming –

Barrett Bogue: – Super SCO!

Audience: – back?

Barrett Bogue: Right now, the plans are to – they're on hold right now.

Audience: Was that from the feedback that VA got?

Barrett Bogue: I will say it is a sensitive subject matter. We did get mixed feedback, and for those not familiar, we had some training videos built upon some cartoon characters, and the main cartoon character was Super SCO. These training videos were meant specifically for SCOs, and we got positive and negative feedback right now, but all I can tell you is the decision is totally out of my hands, and it has gone way above me on whether or not to continue doing those videos and putting them back up. What did you think about the videos?

Audience: Um ...

Barrett Bogue: You can be honest.

Audience: Okay. Personally, I was offended.

Barrett Bogue: Okay.

Audience: I didn't like how it simplified, like, "Go to your Bible, Super SCO, and then you can do everything." I'm sure, as you guys know, it's really not that easy, and I think VA should have been a little more sensitive to the frustrations that we have when it come to certifying the new graduation requirement, those types of things. So, I think that's what I – I just think people needed a little more appreciation for how hard our job was, and I don't think that offered that.

Barrett Bogue: So, Super SCO didn't send that message to you –

Audience: Oh, no.

Barrett Bogue: – and we've definitely heard that before. Super SCO is really for a brand new SCO. That's who our audience is, is a brand new SCO who is a little overwhelmed by the SCO handbook that I talked about. I thought the tuition and fee one, the fourth episode, I really liked that episode, but you know what? Maybe we can differ on opinions but again, I do appreciate your feedback, okay? Thank you.

Audience: Hello. I have a clock hour school, and –

Barrett Bogue: A what kind of school?

Audience: – a clock hour instead of credit. We're clock hours.

Barrett Bogue: Okay.

Audience: So, we have programs, vocational programs for students. For example, a program may be \$5,710.00, and the actual tuition and fee is \$5,010.00 but the books are included in the price of the tuition, books and fees. That's the program. There may be \$700.00 for books that are included. So, when we certify a student, are we to put the tuition and fees and have the student pay for the books because it's an upfront cost for the program?

Barrett Bogue: Well, how is it done? I mean at your institution, are the books and that payment, is that considered a fee?

Audience: Well, there's a \$10.00 registration fee, so there's the books, the fee and – I'm sorry. The program cost, and then a fee, and then the books are included in the program because it's one big program, and they don't go anywhere else to purchase the books, we give the books out to the students, and we may test them, too, like **MCSA** program, there may be a cost or a certified technician. There may be different costs, and that's included in the price. So, what my question is, am I gonna tell you, the VA, they owe this full amount, or is that student gonna pay that tuition ...

Barrett Bogue: It sounds to me like that amount should be included in the tuition and fees that are reported to us.

Audience: That's what we've done in the past.

Barrett Bogue: Yeah, and I'm not an expert on clock hour schools in that particular situation, so I would say I have a high degree of confidence in saying that yes, it should be included in tuition and fees, but if you could e-mail me that, I can find out a 100 percent answer for –

Audience: Because the student –

Barrett Bogue: – you on that.

Audience: – is still gonna get the stipend –

Barrett Bogue: Right.

Audience: – for the books.

Barrett Bogue: That's right.

Audience: Also, when we were talking about, say, that cost, \$5,000.00 whatever, and if the student is eligible for _____ Pell grant money, from what I understand, it's not deducted from that

\$5,700.00 but it's given to the student then? Is that the way it works?

Barrett Bogue: Well, I don't know. I think that would be up to your institution, wouldn't it?

Audience: Well, where else –

Barrett Bogue: I'm not sure.

Audience: – the Pell grant is either gonna go toward the program and you pay less –

Barrett Bogue: Right.

Audience: – or it's gonna go to the student. It has to go somewhere.

Barrett Bogue: It would go to the student in that instance.

Audience: Yeah, because you said the cost –

Barrett Bogue: That's right.

Audience: – you know, you're gonna pay the full tuition, books and fees or whatever, but if there's anything from a Pell grant, then I guess we'll give it to the student.

Barrett Bogue: Correct.

Audience: Okay. Now, another thing is when we talk about a debt to the school. In our programs, we start every Monday, work consecutive. If a student goes through a program, gets less than halfway done and drops out, so we're gonna send the money back to you or give it to the student? Was that correct to give it to the student? I mean we may only charge him for half of the program.

Barrett Bogue: Well, what we say is you refund in accordance with your school policy.

Audience: Right.

Barrett Bogue: So, if that's what your policy is, you would refund that amount to the student.

Audience: So, they'd get maybe \$2,500.00, \$3,000.00 back.

Barrett Bogue: But, at the same time, they're gonna be liable for a debt of the same amount.

Audience: We are liable?

Barrett Bogue: No, the student would be.

Audience: Oh, so the student is gonna pay you back?

Barrett Bogue: Exactly.

Audience: Okay, that's where I'm –

Barrett Bogue: – because the tuition and fees are paid to the school on his or her behalf.

Audience: – right, right, and when the student starts and we certify the student, how long does it take for the payment to be processed to the financial office?

Barrett Bogue: That's a popular question, and it comes with a longwinded answer because our work is seasonal and cyclical. Obviously, we get a lot of work coming in in June, July and August, and that does slow down the processing time. For right now, somebody who is applying for the Post-9/11 GI Bill to determine whether or not he or she is eligible, I believe we're averaging about 30-35 days. That's what we call an original claim. For the enrollment certifications, they're already in the system, you've certified their enrollment, I believe it takes us on average about 17 days right now. But typically, those processing days and that average time goes up when we get into fall.

Audience: Because a lot of the students could be in the program for four months, or they can be in a program for nine months –

Barrett Bogue: Okay.

Audience: – so it's just knowing whether we're gonna get the money, and suppose they did go to another school and used some of those benefits, how are we gonna actually know how much money we are gonna receive?

Barrett Bogue: I don't have an answer to that. It really is based on what you all report to us, and if the student had a certificate of eligibility and you could tell what benefit tier they were eligible at, that would go a long way in helping you figure out how much money you're gonna receive on his or her behalf.

Audience: Okay, and if we only have one student, it goes into the office, into the bank account, since we had to send in the copies of the check stubs for our bank institution. When we first started with the 9/11,

we had to send in, our institution had to send in their bank statement, et cetera, so that's where the money is coming into our bank accounts?

Barrett Bogue: Yeah, the ACH, Automatic Clearinghouse?

Audience: Yeah. Right, right.

Barrett Bogue: Yeah. Exactly. That's correct.

Audience: So, their name will be on it? VA will be on it? How are they planning on letting us know who that student is?

Barrett Bogue: I think it might even have the SSN on it. I'm –

Audience: *[Inaudible comment]*

Barrett Bogue: It does? Okay, it has the student's SSN on it, and name, is that correct?

Audience: *[Inaudible comment]*

Barrett Bogue: Yeah.

Audience: Okay. All right. That's it. Thank you.

Barrett Bogue: Thank you. Thank you all for your help.

Audience: You had mentioned graduate school, so I just wanted to confirm that dental school and medical school and law school is part of the public schools that the VA pays all of the tuition and fees, and if it's a private dental, medical or law school, it'll be capped at \$17,500.00?

Barrett Bogue: Right, so private schools are capped at \$17,500.00. Now, it's all still subject to the eligibility tiers that I talked about, but –

Audience: Absolutely.

Barrett Bogue: – the real key thing to focus in on is public, in-state school –

Audience: Great. Thank you.

Barrett Bogue: – that's it.

Audience: Hi.

Barrett Bogue: Hi.

Audience: I have suggestions before I ask my question.

Barrett Bogue: Okay.

Audience: So, my first one is –

Barrett Bogue: Are you gonna e-mail these to me, as well?

Audience: Sure –

Barrett Bogue: That would be great.

Audience: – I will. I'm always on my computer.

Barrett Bogue: Okay.

Audience: But my first one that I want to yell is please get us a dedicated line.

Barrett Bogue: Yes.

Audience: A dedicated line. **Yeah, that's right.**

Barrett Bogue: Okay, I got a lot of applause on that one yesterday, as well.

Audience: Yeah, a dedicated line, definitely. Also, the letter that we get from the VA that just has the student's name and then the amount in the left of the paragraph and then a tear-off at the bottom, that's not a helpful letter because then you've got to call the non-dedicated line and sit on hold and find out what it's for. So, if the Debt Management Center could get rid of that letter, it's not a helpful letter at all. Do you know which one I'm talking about?

Barrett Bogue: Yeah, I do. I don't work with the Debt Management Center –

Audience: Oh, okay.

Barrett Bogue: – thank goodness, but – no, I'm just kidding. I work in D.C., and Debt Management, I believe, is – actually, I don't know where Debt Management is located, now that I think about it. But I do hear you, and I'd be happy to take that suggestion forward.

Audience: Okay, and then one of the things that we have happening recently in our office is that a lot of students, when they submit for their Chapter 33 eligibility, their review process is being done in error, and so they'll be 100 percent for a year, and then all of a sudden the VA will send them a debt letter for a whole bunch of money because now they're 70 percent or something like that, and so then the student and the campus are requested to send all this money back. This is a question from myself and from my colleague at

NIU that wasn't able to be here, as to what the VA is doing to try and do some quality control in this, because it hurts a lot of students, a lot of them are depending on the funds, and then we have to explain to them, and then we've got people crying in our office and stuff. So, what is the VA doing to kind of –

Barrett Bogue: Well, it really comes down to two things. It comes down to better training for our employees, and communicating to our beneficiaries about the kinds of choices that they make as far as what school they're gonna go to, and for us, we really are focusing in on that training part. I've seen that instance. I have seen that instance, where a student went through a whole semester eligible at 100 percent, and there was an admin error and they should have been eligible at 90 percent. Well, they had been receiving the Yellow Ribbon, so not only was there a debt created for the tuition and fee amount, there was a debt created for the Yellow Ribbon amount, as well. So, it is definitely a – it also involves some IT stuff that is definitely beyond me, but we are looking into that, and we are trying to take care of that, to address that.

Audience: Last question.

Barrett Bogue: Yes?

Audience: Okay, so this is something new that I found, and I'll open for everybody else, but when a student, or when we determine that the debt is where we have to send a check to the student for the amount and then they pay the VA, I came across a student who I was going through the process of doing their reduction, and because I already had them on my desk, I was gonna send the check, but something prompted me – I don't remember what it was – to call the VA. I got somebody really quick _____, but they said that, "Oh, well, because it's the student's first reduction, we give them a waiver on this one, but then this one is lower." And so the difference from what I calculated from what the tuition and fees was and what the VA calculated, it was like a difference of \$200.00. So, had I not called them, the student would have received this extra \$200.00 and only got a debt from the VA for less.

So, my question to my ELR was, "Well, how do I know when to send this money back," and he said, "Well, don't send anything to the student until you get a letter from the student." Yeah, so the student is supposed to come in and say, "Hey, Andrea, the VA said I owe them \$265.00 for this class. Can you get this money to me so I can give it to them?" but our students don't do that. We're a community college, we're small, but still, they don't do that. So,

are there any other campuses that have a different process? Do you suggest something different?

Barrett Bogue: I'm not intimate enough with that process, certainly at the school level, to really make a suggestion. I would be wary of doing that, because it really is on a school-by-school basis. Do you still have that e-mail conversation with you and your ELR?

Audience: It was a phone call.

Barrett Bogue: Oh, it was?

Audience: Yeah.

Barrett Bogue: Okay. I'd be interested in looking into that, especially in that student's particular file, just to kind of see what went on. If you want to send that to me, we can.

Audience: Okay.

Barrett Bogue: But, like I said, I hesitate to make a suggestion for your school, but you'll probably find some good ideas out here from everybody else.

Audience: Thank you.

Barrett Bogue: Thank you.

Audience: For the Guard members who are retroactively eligible, are those individuals aware of that so they'll be letting us know, or should we be attempting to do outreach to our Guard members?

Barrett Bogue: Well, both, really.

Audience: Okay.

Barrett Bogue: I mean what we've tried to do is we've – there's a limited amount of what we can really do to try and find them and grab them and let them know about this change, but it's a communication issue for VA, but also for you all. Again, this is why I took this opportunity to mention it. If you know of somebody who fits that scenario, definitely reach out to them, let them know, and send us an enrollment certification. Of course, if they've applied for the Post-9/11 GI Bill, they need to apply first, but we are trying to raise awareness about the fact that National Guard men and women are eligible for the Post-9/11 GI Bill.

Audience: And it was just a specific subset of Guard members, correct?
_____ –

Barrett Bogue: Yeah, it was.

Audience: – _____ it depended –

Barrett Bogue: Yeah, there's some more qualifiers about the –

Audience: – okay.

Barrett Bogue: – type of active duty service.

Audience: And I'm assuming all that information is on the VA website?

Barrett Bogue: It –

Audience: _____ –

Barrett Bogue: – absolutely is.

Audience: – look at that –

Barrett Bogue: Yes.

Audience: – and try to identify –

Barrett Bogue: Yes, it is.

Audience: – it there. Okay. Thank you.

Barrett Bogue: Yeah. You're welcome.

Audience: I'm short. Hi.

Barrett Bogue: Hi.

Audience: Thank you for your service, first of all.

Barrett Bogue: You're welcome. Thank you.

Audience: I have a few suggestions. I have many questions. One question, I'm not sure if you can answer. I'm in Michigan. We're an **NCD** school. We recently opened a campus in Houston approximately a year ago, and I'm being told by Texas, and by Michigan – I'm being told a lot of different things, and I'm not sure if you can even answer, because in Texas, I'm being told just to go ahead and apply for a facility code to see if we're eligible. People that I have contact with in Michigan, and have had contact in Michigan with

for many years, are telling me they're not eligible for two years, but no one seems to know when that two-year point is. Is it from when I first certified, authorized by the state, or when we first started classes? I'm not sure who to contact –

Barrett Bogue: So, each state –

Audience: – or where to go.

Barrett Bogue: – each state has a different program approval process, and **Connie Jacksits**, I believe, is the Texas SAA. If I understand your question correctly, you would have to go through the Texas SAA for your institution to be approved for education benefits there in Texas.

Audience: In Michigan, that recently got changed –

Barrett Bogue: Yeah.

Audience: – _____ from the SAA to the ELR, **which poor**, I mean she's overloaded, because I just had to submit changes to her.

Barrett Bogue: Yes. Yeah –

Audience: So, I would still contact –

Barrett Bogue: – your ELR.

Audience: – in Texas the SAA and not the ELR?

Audience: *[Inaudible comment]*

Audience: Is this the first time you have a –

Audience: *[Inaudible comment]*

Audience: – okay. Thank you. I appreciate that. Do you have a contact name? Is it Connie?

Audience: *[Inaudible comment]*

Audience: That would be great. Thank you. And just a couple comments. Hopefully, you can take them back. You've touched on a lot of them about training and support for the VA students. I have VA students in my office every day. I'm a financial aid director. However, the VA students are in my office every day complaining about the answers that they're getting from the education hotline, and they're being told – I mean they can hang up and call right back and get a different answer. So, it's very frustrating for us because then someone – for instance, with the break/interval pay,

we had a break between quarters of four days. It was a Friday, Saturday, Sunday, Monday. A student came in and said, "I was docked \$400.00. They said it's your fault. Please fix it." It wasn't our fault, it was accurate information, but if the education center could get more – the call center could get more training, but the school certifying officials, because as an NCD school, we just started, you know, we're just now eligible for Post-9/11. We can't really get any good answers, and we're kind of winging it and crossing our fingers.

Barrett Bogue: Have you looked at the SCO handbook?

Audience: Yes, it's my Bible.

[Laughter]

Barrett Bogue: Good, good, good.

Audience: And I do believe that what we're doing is correct, but, for instance, I didn't know what you had suggested about putting zero in for tuition and fees, and I received payments for next April, so I was a little bit shocked and concerned, and calling my ELR and she's like, "No, just put the money on the student's account." I don't feel comfortable with that. I also asked the question on the GI Bill website, and they said, "We can't tell you what to do, kind of make your own decision." So, training, please, if you could take that back –

Barrett Bogue: Yeah, it sounds like training, and then support and affirmation for what you're doing would be helpful, from VA, and yes, I mean –

Audience: And even, like you've been touching on, communication to the students, because they had no idea about this break/interval pay. I mean I was flooded with students for two weeks.

Barrett Bogue: See, from my perspective, but of course I have a very limited perspective from where I work, they all know about losing break or interval pay because it's so controversial, and believe me, I'm surprised when I hear that, that they don't know about that. So, I'm glad you know about it and that you can tell them about it right now. But again –

Audience: Well, they all received a letter from me, but it's my opinion and just my personal opinion that they should have received a letter from VA prior to it happening.

Barrett Bogue: Well, what we did is **when the** ten days after it became law, we sent a letter out to every beneficiary who we had found eligible for

the Post-9/11 GI Bill in a green envelope, and in that letter it included – I believe it was even bolded – the loss of break or interval pay, and we have it on the top header of every different benefit information page on our website, and we talk about it on Facebook. So, we are communicating it, but again, it's still that challenge of making sure everybody hears it.

Audience: Okay, what I just heard from you is that it was only Post-9/11 students, but this happened prior to October 1.

Barrett Bogue: I misspoke. It was for all education beneficiaries.

Audience: Okay.

Barrett Bogue: Yeah –

Audience: All right. _____ –

Barrett Bogue: – I misspoke.

Audience: – _____.

Barrett Bogue: But break or interval pay does – yeah, it applies not just for Post-9/11 but for all education benefit programs. We can no longer pay it.

Audience: Okay. All right. Thank you.

Barrett Bogue: You're welcome. Thank you, and if you want to send those suggestions to me in an e-mail, that would be great.

Audience: Hello.

Barrett Bogue: Hi.

Audience: I just have a quick question.

Barrett Bogue: Can you speak up just a little bit?

Audience: For debts and overpayments that the student gets and there hasn't been any changes, any major changes to their circumstances – they didn't change classes, they didn't drop below fulltime or their credit load, or anything like that – and as far as we know their eligibility range hasn't changed any, when a student gets a debt for an overpayment, can we assume that the school is gonna get an overpayment, as well, for that same student? Because it seems as though I've had a couple students, and it's also been my personal experience, where I've gotten a debt letter or a student of mine has

gotten a debt letter from the VA, and nothing has changed with the student, and then they call and wait, and wait, and wait, and the answer is, "Your school got too much money from us." And so the expectation is that the school will refund the student and then the student pays it back, but in that same instance, shouldn't the school also get a debt letter from the VA, as well, if the overpayment is because the school got too much money, and not the student, if that makes sense?

Barrett Bogue: I –

Audience: *[Inaudible comment]* –

Barrett Bogue: – I'm sorry. Go ahead.

Audience: Because it seems as though –

Audience: *[Inaudible comment]*

Audience: – I guess my bigger concern is that it seems as though the processing time, the actual veteran will get the letter, the debt letter before the school actually receives it, and so if the veteran pays the debt or makes some kind of arrangement or freaks out, or whatever they're gonna do, the school may not be notified if the student never goes into the office that the school has a debt until much later.

Barrett Bogue: Until the student tells you.

Audience: Right.

Audience: _____ student does get it first.

Audience: Right.

Audience: _____ at a meeting about a month ago in Myrtle Beach, and they said that there's a lag time of about 45 days. First, the school will get a notification letter, and then you'll follow up _____ 45-day difference until you get the one with the slip _____ asking you to pay, but it's not always the school's responsibility. I guess it's according to how the certifying official submits the change, but yes, the student will always get notification **before the school**.

Audience: Okay.

Audience: **I mean** that's our **experience, anyway**.

Barrett Bogue: If you want to talk after this about it, do you have a certain student in particular?

Audience: I mean, sure, it's just I guess if the student – you know, the letter says, "If you don't pay, we're gonna deduct from your future payment," and then if it's an overpayment where the school is gonna be notified and get notified to make a back payment for the school, is there a way just to communicate with the VA, "We received this information from the school. We understand that it's a school overpayment, not a student overpayment. We will be making the payment later on," and not deduct from the student –

Barrett Bogue: It sounds like what we –

Audience: – if that makes sense?

Barrett Bogue: – should probably consider is telling that information in the letter that's sent to the student, and letting them know that this will be coming from the school and not you but that it's still related to your claim –

Audience: Right.

Barrett Bogue: – if I'm hearing you correctly.

Audience: Yes –

Barrett Bogue: Okay.

Audience: – that would be perfect.

Barrett Bogue: Yeah. If you could do me a favor, and I'm relying on this like a crutch, but if you could e-mail that to me –

Audience: Okay.

Barrett Bogue: – because what I do is I take all this stuff and kind of compile it, and then I say to my senior leadership, "Okay, here's some of the big themes and feedback that emerged," and I'd be happy to include that.

Audience: Okay.

Barrett Bogue: Okay?

Audience: Thank you.

Barrett Bogue: Thank you. Yes, sir?

Audience: Hi.

Barrett Bogue: Hi.

Audience: I have a suggestion that I'm gonna frame as a question.

Barrett Bogue: Great.

Audience: Okay –

Barrett Bogue: I like it.

Audience: – a little bit of background. We are a very traditional private liberal arts school, 99 percent residential, all of our students are fulltime. Fulltime is considered 12 hours, but most of our students are taking 16 to 18 credit hours per semester. We are Yellow Ribbon participants.

Barrett Bogue: Great.

Audience: Okay? This fall semester, we have students whose net charged tuition and fees was \$14,055.00, and their Post-9/11 tuition and fees payment that came for the fall semester was \$14,055.00 of their total \$17,500.00 that they're allowed to receive for the whole academic year. Furthermore, because they're enrolled for 16 or 18 credit hours, their book stipend comes to them at \$700.00, meaning for the spring semester they're only going to get \$300.00. So, my question, or suggestion, is is it possible to have these static amounts, these amounts that are not gonna be changing based on your credit hours, come in equal disbursements for the fall and for the spring? So, for the book stipend, can we get \$500.00 for the fall, \$500.00 for the spring, and for the tuition and fees benefit can we get \$8,750.00 for the fall and \$8,750.00 for the spring? That makes it easier for us to budget our Yellow Ribbon payments, and it makes it easier for the students to budget for their books and supplies costs.

Barrett Bogue: Who else in here would like us to break it up like that? So, having the \$17,500.00 as a pot and then you pull from it, and once you're done, you're done, you don't like that? Okay. Well, a lot of our beneficiaries are not at a traditional school such as yours, so they're not going fall and, you know, trimester, quarterly, things like that, and so dividing it up, it opens up a big can of worms over, "How do you divide it proportionately and fairly, and do we have the legal basis to do that? Was that Congress' intention?"

Audience: Well, I guess is it possible to designate, or to create a designation somewhere, where we as a school say, "We would like to have it come 50/50 for us"?

Barrett Bogue: That's interesting. I haven't thought about that. I mean, technically, we can only pay what you all report to us.

Audience: I reported – well, I mean I reported the net charge tuition and fees, and then I said how much I was expecting us to pay in Yellow Ribbon benefits –

Barrett Bogue: Right, right.

Audience: – but you all just kind of ignored the Yellow Ribbon benefits and paid \$14,055.00.

Barrett Bogue: So, they didn't get a Yellow Ribbon payment at all?

Audience: Not for the fall semester. For the spring semester, they'll get 3,000 some odd dollars in tuition and fees benefit, and then we'll kick in all of our Yellow Ribbon benefit and you'll kick in your Yellow Ribbon benefit, all on the spring semester.

Barrett Bogue: Okay, I didn't know it was being done like that.

Audience: *[Inaudible comment]*

Barrett Bogue: Right.

Audience: *[Inaudible comment]*

Barrett Bogue: Right.

Audience: *[Inaudible comment]*

Audience: Right, but that's what I'm wondering, is it possible for a school to designate, based on our population and how our students come to our school and how they tend to be there, is it possible for us to designate, "We want \$8,750.00 for the fall and \$8,750.00 for the spring," or is it possible to do an annual certification for the entire year, you know, fulltime, because it doesn't really matter whether it's 12, 14, 16 or 18, because all of our students are gonna be fulltime if they're gonna be there.

Barrett Bogue: Right.

Audience: So, can we just designate fulltime, and if we designate fulltime, then do half and half?

Barrett Bogue: Theoretically, and I think in practice, it's certainly possible. It might require a regulatory change, and it might require a change in VA-ONCE, and so that's where the hang-up –

Audience: I knew there would be a major program –

Barrett Bogue: – yeah.

Audience: – change.

Barrett Bogue: I mean it would be a programming issue, and so right now all the assets are being pushed towards the changes that happen in January, and then now we have this new VOW program. So, some of this stuff just falls down lower and lower, but that's a very intriguing idea, and – I've got five minutes. I'd be happy to take it back and talk, because the person who's in charge of VA-ONCE, his office is right next to mine and I bug him all the time.

Audience: Okay.

Barrett Bogue: So, I will definitely talk to him about that, okay?

Audience: Great, great. Thank you.

Barrett Bogue: Thank you.

Audience: Hi.

Barrett Bogue: Hi.

Audience: First of all, I did find something in the SCO handbook for the person who had the question about the in-state tuition, public institution/in-state tuition –

Barrett Bogue: Yeah.

Audience: – and it says, "If tuition and fees are known, submit the actual net costs for in-state tuition and fees for each term," and it's on Page 37, if that's of –

Barrett Bogue: Okay.

Audience: – any help. But my question involves out-of-state, just like that first person. I've had students who are out of state, we're a public institution, and they are very confused about the fact that we have to report this as only in-state tuition max. So, I had several students mid-year, when the payments came in from the VA, who were very upset stating, "Why didn't you report my full 100

percent tuition?" and when I explained it to them, they said, "That's not true. We called the VA." So, _____ to your website and I looked for it to be able to show it to them, you do have it there, but you have to actually link to it three times before you find it in really tiny, fine print about the fact that you can only get –

Barrett Bogue: In-state.

Audience: – in-state tuition. So, is this something that I should send an e-mail as a suggestion, because –

Barrett Bogue: Yeah, absolutely, and the school resource page that we have right now, we're putting a lot of energy into it but, in the long term, we're gonna do something similar for students where our website is gonna be restructured around the people we serve. So, we're gonna have a site-specific for schools, a site-specific for students, **where your** information _____ will go, a site-specific for future students. So, yeah, we can do a better job of raising awareness about that distinction, and we will.

Audience: Sure. Thank you, and the letters, too, because the letter isn't real precise about that when they get their eligibility letter. Is that something that your area would take care of, or do I need to e-mail someone else with that same suggestion?

Barrett Bogue: You can e-mail it to me, and then I can shoot it off to the team leader who's responsible for the generated letters and whether or not that language is included.

Audience: Okay. Thank you very much, by the way. I know the first year was a rough transition, but I noticed the payments have been coming in much better, at least for my school this year, so I'm –

Barrett Bogue: Good.

Audience: – very glad to see that.

Barrett Bogue: Thank you. Thank you for the feedback.

Audience: Good afternoon.

Barrett Bogue: Hi.

Audience: I work for an institution that has 31 campuses in six states. We, about four years ago, started going paperless, where everything is imaged and then shred, and the problem that we have is in each state, when we get audited, we get different answers. For instance, in Ohio, there's a new gentleman who says, "You have to keep

paper files at your campus all the time. When I audit you, I'm gonna write you up," and Tennessee tells us something different, and Kentucky tells us something different. What's the rule about VA files for students? Can we have them all imaged, print them out, have them there for their auditor to review and be fine, or do you have to keep a paper file at all times?

Barrett Bogue: I don't know. I really don't know, but I would be happy to find out for you.

Audience: Okay.

Barrett Bogue: I mean I definitely sense your frustration there, but –

Audience: Because our person in Tennessee is really good and on top of everything, and so far has been spot on, and now this person in Ohio has just come back and changed the world and we're like, "Okay." You know, it's hard to manage –

Barrett Bogue: VA files, I mean I would think that would be a state requirement, not necessarily a VA requirement, as far as for keeping student records. I mean is that why you have the disparity between –

Audience: It's the VA officials telling us different things.

Barrett Bogue: Is it the ELR?

Audience: The gentleman is not the ELR. What's the next level above?

Barrett Bogue: The state approving agency?

Audience: I'll e-mail you the names. I've got them at work, so I can e-mail you the names. But we get different answers, so we're trying to write our policies and procedures, and we don't know which way to go with it.

Barrett Bogue: Well, if it's the SAA, it's something that we have very little, surprisingly maybe, influence on, because each state has their own different policies and how the files are handled. But if it's an ELR issue – Education Liaison Representative – that's something that we can definitely look into. Those are VA employees. The SAAs are not VA employees.

Audience: Okay. I'll e-mail you.

Barrett Bogue: Okay?

Audience: Thank you.

Barrett Bogue: Thank you. Last question. Congratulations.

Audience: Thank you. Quick question, and so the SAAs are whose employees, the state's?

Barrett Bogue: I can't hear you. I'm sorry.

Audience: So, you said the SAAs are not the federal employees. Are they considered state, then?

Barrett Bogue: Yeah, the SAAs, it's an interesting kind of symbiotic thing that we've got going on with the SAAs, but what it is is we have a contract with all the SAAs per state to do work on our behalf.

Audience: So, they're contractual?

Barrett Bogue: Yeah, but they are state employees, so they could be a state employee being paid by the state and they have additional responsibilities in addition to what they do for VA –

Audience: Okay.

Barrett Bogue: – but they are not VA employees.

Audience: Okay, now my real question.

Barrett Bogue: Yes?

Audience: We are a 100 percent credit hour school.

Barrett Bogue: Okay.

Audience: All of our programs are approved through our **agency** _____ credit hours; however, we do have our nursing clinicals and other clinicals that may go on. Are we required by any regulatory or statutory definition to certify those clinicals in clock hours, even though we are a 100 percent credit hour school and we will issue credit hours for those practicums and those clinicals? Do I have to switch and certify those clinicals in clock hours?

Barrett Bogue: I don't know. Does anybody else in the room have – yes?

Audience: *[Inaudible comment]*

Audience: You do not. Does anybody in the room do that, I mean just out of curiosity, because my ELR is telling me that **regulatorily** I am required to certify any lab in a clock hour capacity. Even though we're a credit hour school, I must certify labs in clock hours in

order to push the student past the fulltime status so they get their housing benefit.

Barrett Bogue: Did he cite the reg?

Audience: He did, and he threatened to write me up if I don't do it, which seems to be a pretty common practice from what I'm hearing –

Barrett Bogue: Okay.

Audience: – that those threats kind of go out there, but that would be a huge administrative burden on us because we don't track anything in clock hours.

Barrett Bogue: Let's talk about that offline, because we –

Audience: Happy to.

Barrett Bogue: – are running over schedule, but if you want to call or e-mail that to me, or if you want to wait outside, we can talk –

Audience: I'll wait.

Barrett Bogue: – about it, okay?

Audience: Thank you.

Barrett Bogue: Thank you. Thank you, everybody.