

**Unless stated otherwise, normal rules as found in the SCO Handbook apply for all VA reporting requirements.**

## COVID-19: NCD SCO FAQs

**Q1) With the enactment of S.3503 on 3/19/2020, signed into law on 3/21/2020, can an NCD education or training institute offer programs that were not previously approved by the State Approving Agency due to COVID-19?**

Answer: No, only programs previously approved by the SAA will be available for NCD institutions to continue enrollments of GI Bill students.

Note: If the NCD institution seeks approval of any new programs, they must contact the State Approving Agency and complete application.

**Q2) What happens when an approved program at an NCD education or training institution temporarily ceases resident training and has the capability to convert training to an online modality during the COVID-19 national emergency?**

Answer: An NCD with a current SAA approved program may continue to train and report enrollments to the VA. Those students who pursue courses converted to an on-line modality solely due to COVID 19 will continue to receive the MHA rate for resident training. The law only authorizes this special authority from March 1, 2020, to December 21, 2020.

- SCOs should not report modality changes due to COVID-19 for any current enrollments submitted to VA.
- Note: other types of changes to the student's enrollment status may affect payments. Non COVID-19 related changes must still be reported per normal requirements.

Terms Moving Forward (not already submitted to VA):

- Educational institutions which convert modalities as described above can submit certification of resident courses converted to online modality as resident courses.
  - Use the Resident Credit Hour or Clock Hour portion of the VA ONCE enrollment certification.
  - If any adjustments were made to the start or end date, these adjustments need to be reported to the VA so accurate payments can be completed.
  - Enter Standard Remark "COVID-19 Residence Courses Taken Online"

Note:

- The effective dates of the new law covering March 1, 2020 to December 21, 2020 allow NCD schools to continue training for converted programs/classes/courses due solely to COVID-19. When an NCD goes back to normal operations for resident courses, the school will continue to submit enrollment certifications to the VA without the requirement of the additional "COVID-19 Residence Courses Taken Online" remark.
- NCD schools not currently approved to offer online courses, will not be allowed to continue to offer online modality after 21 December 2020.

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**Q3) What happens when an NCD training institution temporarily ceases operations due to COVID-19 and cannot offer a program via online modality?**

Answer: When this occurs, the NCD should not submit enrollment adjustments for the current term. However, the SCO must report the temporary school closure to the Education Liaison Representative (ELR) and State Approving Agency (SAA) AS SOON AS POSSIBLE. It is important to notify the ELR and SAA as soon as practical, so the claimant's monthly stipend is correctly adjusted.

- The school should refund payments per the approved policy as soon as possible.
- If the educational institution has temporarily ceased operations to all students due to COVID 19, affected students will continue to receive their MHA until the sooner of the end of the term or 4 weeks (28 days) from the date that the NCD temporarily ceased operations.
- Current law only provides protection for stoppage in training when the school ceases operations completely (temporary or permanent).

When NCD Resumes Operations: Guidance in development. Will be forthcoming at a later date.

**Q4) What happens when an NCD vocational flight training institution temporarily ceases operations due to COVID-19?**

Answer: When this occurs, the NCD vocational flight institution should submit current flight hours per standard reporting requirements based on the last day of training (time to report will be extended). VA will process and pay benefits for qualifying tuition and fee costs to the NCD flight institution.

Resumes Operations:

- When an NCD vocational flight institution resumes operations for flight training:
  - Normal resumption of monthly flight training reported to the VA using VA-ONCE.
  - Note: Flight medical certification must still be current.

**Q5) If a student becomes ill or withdraws from course on their own accord, due to COVID-19 and they cannot continue training while the NCD institution continues to offer course training, what steps need to take place?**

Answer: The SCO should review their institution's attendance, leave of absence, and "Incomplete Grade" policy and apply as appropriate.

If the school's policy dictates that an Incomplete Grade or Leave of Absence is not an option, the SCO must:

- Report the withdrawal based on the attendance policy and report COVID-19 as mitigating circumstances.
- The student's last day of attendance should be reported as the effective date.
- The NCD institution's refund policy should be applied as soon as possible.
- In these situations, the law does NOT allow VA to continue payments beyond the last day of attendance.

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If the school's policy allows Incomplete Grade or Leave of Absence as an option, the SCO must follow normal established procedures.

Student Resumes Attendance:

- An NCD educational institution will complete standard enrollment practices associated with any prior withdrawal by a student.
- Note: If the student returns during the 1 March 2020 to 21 December 2020 timeframe, the school may continue to report converted courses to the VA in accordance with established guidance provided in the FAQs.