

Procedural Advisory: School Certifying Official (SCO) Guidance for Certifying Chapter 33 Graduate Training – Updated Guidance

August 13, 2021

Background: In accordance with 38 CFR 21.9750, VA will calculate an individual's rate of pursuit. Under chapter 33, a School Certifying Official (SCO) must report the minimum number of credit hours their academic regulations require to be considered full-time, to ensure proper entitlement is charged and appropriate payments are released for any rate of pursuit (RoP). (38 CFR 21.9640 and 21.9560, Authority 38 USC 3313) Presently, not every school has published or defined in their catalog the number of credits required to be considered full-time while enrolled in non-standard length terms. Until or unless all schools have included full-time requirements for non-standard length terms, the applicable guidance and procedures will vary. In some scenarios, the full-time modifier will need to be calculated by the SCO for subsequent use in determining RoP by the Long Term Solution (LTS).

In July 2019, SCOs were notified to add the VBA Standard Remarks; "*Graduate non-standard term*" in certain situations. This will no longer be necessary under any circumstances.

Issue: Effective August 1, 2021, the LTS no longer automatically performs credit hour equivalent calculations for graduate training in non-standard terms. When the training type is graduate, the LTS will use the entry from the TT/FT field (in VA-ONCE or paper VA Form 22-1999) as the denominator in the RoP calculation. All non-standard terms for graduate training submitted on or after August 1, 2021 will be impacted, including retroactive terms. Previously submitted terms will not be reprocessed without additional notice to VA.

NOTE: It may be necessary to resubmit impacted terms if the certification was submitted prior to the date of this guidance.

New Reporting Procedures for Graduate Training for Non-standard Terms:

In *all* instances, SCOs must always certify the actual credit hours applicable toward the student's program for all enrollment periods. If the SCO certifies a graduate student for a non-standard length term, VA will no longer convert the credit certified to an equivalent credit hour (ECH).

Note: These new reporting requirements will be reviewed during compliance surveys.

- A. Schools *with* individually defined full time modifiers (IDM) for non-standard terms should report the FT modifier for the IDM in the TT/FT field only. Remarks are no longer needed. In all scenarios involving graduate training for chapter 33 enrollments, LTS will divide the number of credit hours certified by the number of credit hours required to be considered full-time to determine rate of pursuit.

B. Schools **without** individually defined full time modifiers (IDM) for non-standard terms will be required to determine an adjusted FT modifier prior to reporting any graduate training. This is necessary to replace the ECH calculation previously performed automatically by the LTS. Once the adjusted FT modifier is determined for a particular non-standard term, that adjusted FT modifier can be reported for all graduate students enrolled in any non-standard term of the same length. (This equation is required for each particular non-standard term length, not per individual student.)

Please review the attached Glossary of Terms to assist using these new reporting guidelines.

Use this chart to help determine the proper method for reporting grad training to VA (IDM or no IDM relative to term length):

	Term Type	Duration of term	IDM	Minimum number of credit hours required to be full-time per academic regulation (Full Time modifier)	Report in the FT/TT Field in VA-Once
Semester	Standard	15-19 weeks	No	Modifier <i>is</i> defined & published in catalog	Published FT modifier
Quarter	Standard	10-13 weeks	No	Modifier <i>is</i> defined & published in catalog	Published FT modifier
Semester	Shorter	less than 15 weeks	No	Modifier <i>not</i> individually defined/published	SCO determined FT modifier
Quarter	Shorter	less than 13 weeks	No	Modifier <i>not</i> individually defined/published	SCO determined FT modifier
Semester	Shorter	less than 15 weeks	Yes	Modifier <i>is</i> individually defined/published	Published FT modifier
Quarter	Shorter	less than 13 weeks	Yes	Modifier <i>is</i> individually defined/published	Published FT modifier
Semester	Longer	greater than 19 weeks	No	Modifier <i>not</i> individually defined/published	SCO determined FT modifier
Quarter	Longer	greater than 13 weeks	No	Modifier <i>not</i> individually defined/published	SCO determined FT modifier
Semester	Longer	greater than 19 weeks	Yes	Modifier <i>is</i> individually defined/published	Published FT modifier
Quarter	Longer	greater than 13 weeks	Yes	Modifier <i>is</i> individually defined/published	Published FT modifier

New Reporting Procedures for terms/schools without IDMs: Because LTS will no longer compute the ECH for graduate training in non-standard terms, it is necessary for the SCO to determine the FT measure for all non-standard terms, using the published full-time modifier applied to a new equation. The solution to this equation is identified as the “**Adjusted Full Time Modifier**” (**Adj FTM**). The RoP is the determining factor for the monthly housing allowance (MHA) rate. Failing to conduct this adjustment prior to reporting non-standard term graduate training could result in an incorrect RoP, which in turn may cause an over or underpayment of MHA to the student.

- 1) First, calculate the number of weeks in the enrollment period to be certified. Count the number of days in the enrollment period (first day through the last day, including weekend days) and divide by 7. Disregard a remainder of 3 days or less or count a remainder of 4 days or more as an additional full week.

Example: Fall mini session begins August 24, 2021 through October 8, 2021.

Term includes: 8 days in August
 30 days in September
 8 days in October

46 days in mini session ÷ 7 = 6 weeks and 4 days

Round up to 7 weeks. VA considers this a 7-week term.

- 2) Using the appropriate chart below, determine the adjusted full-time modifier (Adj. FTM) for the non-standard term. Find the published full-time modifier in the school’s catalog in the header row of this chart. Next, find the week in the left margin that corresponds to the non-standard term based the result from Step One. Follow both lines to a point. This will be the adjusted full-time modifier for the term in question.

Note: If the published full-time modifier for standard terms is not found in either of the charts below, please contact your [Education Liaison Representative \(ELR\)](#) for additional information.

SEMESTER HOURS				
FT Modifier	3	6	9	12
Weeks				
1	1	1	1	1
2	1	1	1	1
3	1	1	1	2
4	1	1	2	2
5	1	1	2	3
6	1	2	3	4
7	1	2	3	4
8	1	2	4	5
9	1	3	4	6
10	1	3	5	6
11	1	3	5	7
12	2	4	6	8
13	2	4	6	8
14	2	4	7	9
15 to 19 (Standard)	3	6	9	12
20	3	6	10	13

This chart is intended for use by institutions with no individual modifier (IDM) for a non-standard term.

Figure 1. Semester Hour Chart to figure ADJ FT

QUARTER HOURS					
FT Modifier	1	3	6	9	12
Weeks					
1	1	1	1	1	1
2	1	1	1	1	2
3	1	1	1	2	3
4	1	1	2	3	4
5	1	1	2	3	5
6	1	1	3	4	6
7	1	1	3	5	7
8	1	2	4	6	8
9	1	2	4	6	9
10 to 13 (Standard)	1	3	6	9	12
14	1	3	7	10	14
15	1	3	7	11	15
16	1	4	8	12	16
17	1	4	8	12	17
18	1	4	9	13	18
19	1	4	9	14	19
20	1	5	10	15	20

This chart is intended for use by institutions with no individual modifier (IDM) for a non-standard term.

Figure 2. Quarter Hour Chart to figure ADJ FT

- 3) Use this **Adj. FTM** in the TT/FT field when reporting grad training for all graduate students enrolled in this term. This **Adj. FTM** should be used regardless of the number of graduate credits in which each student is enrolled.

Questions: If you any questions, please contact your [Education Liaison Representative \(ELR\)](#).

Attachment: Glossary of Terms

SEMESTER HOURS

FT Hours	1	2	3	4	5	6	7	8	9	10	11	12
Weeks												
1	1	1	1	1	1	1	1	1	1	1	1	1
2	1	1	1	1	1	1	1	1	1	1	1	1
3	1	1	1	1	1	1	1	1	1	1	1	2
4	1	1	1	1	1	1	1	1	2	2	2	2
5	1	1	1	1	1	1	1	2	2	2	3	3
6	1	1	1	1	1	2	2	2	3	3	3	4
7	1	1	1	1	1	2	2	3	3	3	4	4
8	1	1	1	1	2	2	3	3	4	4	4	5
9	1	1	1	2	2	3	3	4	4	5	5	6
10	1	1	1	2	2	3	3	4	5	5	6	6
11	1	1	1	2	3	3	4	4	5	6	6	7
12	1	1	2	2	3	4	4	5	6	6	7	8
13	1	1	2	2	3	4	5	5	6	7	7	8
14	1	1	2	3	3	4	5	6	7	7	8	9
15 or >	1	2	3	4	5	6	7	8	9	10	11	12

QUARTER HOURS

FT Hours	1	2	3	4	5	6	7	8	9	10	11	12
Weeks												
1	1	1	1	1	1	1	1	1	1	1	1	1
2	1	1	1	1	1	1	1	1	1	1	1	2
3	1	1	1	1	1	1	1	2	2	2	2	3
4	1	1	1	1	1	2	2	2	3	3	3	4
5	1	1	1	1	2	2	2	3	3	4	4	5
6	1	1	1	2	2	3	3	4	4	5	5	6
7	1	1	1	2	2	3	4	4	5	5	6	7
8	1	1	2	2	3	4	4	5	6	6	7	8
9	1	1	2	3	3	4	5	6	6	7	8	9
10 or >	1	2	3	4	5	6	7	8	9	10	11	12