

TO: Chief Executive Officers
Chief Instructional Officers
Chief Student Services Officers
Veterans Services Directors or Coordinators

FROM: Marty J. Alvarado
Executive Vice Chancellor, Educational Services & Support

RE: Guidance Regarding Student Veteran Educational Benefits During the COVID-19 Crisis

The COVID-19 pandemic and the required social and physical distancing has substantially disrupted face-to-face instruction at all institutions and has required colleges to switch to online instruction. It is essential that colleges fully support student veterans during this crisis and assist them with the transition to online education. Colleges must be particularly attentive to educational benefits under the G.I. Bill. The Chancellor's Office continues to work with the United States Department of Veterans Affairs (VA) to mitigate the impact of the crisis on student veterans and to assist them with their educational needs and related benefits under the G.I. Bill. This memo primarily addresses these resources, including recent changes in federal law that support continued online education for veteran students, and Chancellor's Office executive orders and guidance memoranda related to grading that may affect student eligibility for educational benefits during the pandemic. We have also included an update on the status of Veterans Administration compliance audits on the part of colleges given the current national crisis.

G.I. Bill (S.3503 – March 21, 2020)

Emergency legislation S.3503 gives the VA temporary authority to continue educational benefits for distance education during the COVID-19 crisis. If a college converts from an approved residence training course to online training for that course (distance learning) due to COVID-19, benefits will not change. However, the law only authorizes this special authority from March 1, 2020, to December 21, 2020, and it only applies to students enrolled in courses affected by COVID-19. Other types of changes to enrollment status (e.g., dropping a class) may affect payments. Colleges should advise veteran students to consult with the VA directly to learn more about their specific COVID-19 related benefits. We have provided some contact information below. The VA has released a series of [Frequently Asked Questions \(FAQs\)](#) related to S. 3505 and maintains a [COVID-](#)

[19 Response](#) webpage. Colleges may find these resources helpful when adjusting policies and procedures or when advising veteran students.

To that end, Veterans Services School Certifying Officials (SCOs) certify G.I. Bill benefits and should be familiar with these extended educational benefits and the related educational requirements. This includes course modality - differentiating between a resident or face-to-face course and a distance or online course, as this certification has implications for the level of benefits accessible to veteran students, including their housing allowance. Colleges should be attentive to the following:

- Course Modality in Summer & Fall 2020. Colleges planning to provide online distance education courses for the Summer 2020 or Fall 2020 terms due to COVID-19 should maintain documentation that distinguishes courses originally approved and scheduled to be offered online versus those courses that were only transitioned to online due to physical distancing requirements. Courses that were originally intended as face-to-face offerings should continue to be certified as resident courses in the VA-ONCE system, regardless of a planned or subsequent transition to online distance education due to COVID-19. The VA has indicated that they will rely on the SCO to accurately report the intended course modality and, as such, SCOs, where possible, should maintain documentation that supports their certifications.
- Cancelled Courses. In the event that select courses are cancelled due to COVID-19, colleges must report these changes in a timely manner and designate, where applicable, when the cancellation is due to COVID-19. Current law only provides protection for cancelled courses when the school ceases operations completely (temporary or permanent); however, students that have received aid up to the point of the cancellation will not be required to repay funds when the cancellation is COVID-19 related. Aid received after the cancellation date may be required to be repaid, thus timely reporting is critical. When reporting this change using VA ONCE, the SCO should complete steps to report mitigating circumstances, citing "COVID 19". If paper 1999b termination is reported, the SCO should include "COVID-19" in the remarks section.¹
- Postponed or Delayed Courses. If courses are postponed due to COVID-19, or if training temporarily ceases then resumes, colleges should amend the student's G.I. Bill certification in the VA-ONCE reporting system to reflect the updated break dates and new

¹ COVID-19 FAQs, #8

term end dates.² These changes will ensure that students maintain access to benefits throughout the updated term dates.

Flexible Grading Options and Payment of Benefits

Chancellor's Office guidance memo [FS 20-04](#) explains that COVID-19 is a recognized extraordinary condition and that students withdrawing from one or more courses due to the COVID-19 pandemic qualify for both an Excused Withdrawal (EW) and a full refund of enrollment fees for those courses. Additionally, guidance memo [ES 20-10](#) allows for a pass/no pass grading option and encourages colleges to implement these policies in ways that support student progress. Implementation of the flexible grading options is a local decision.

The VA classifies course grades as either punitive or non-punitive. A punitive grade is a grade assigned for a course used in determining the student's overall progress toward completion of the school's requirements for graduation. A non-punitive grade is a grade that does not count as earned credit and is not considered in progress standards for graduation. The VA issues payment of benefits for courses that may receive punitive grades only.

Based on these definitions, several of the flexible grading options, such as EWs, Incompletes, and No-Pass, are considered a non-punitive grade and would not be eligible for payment of benefits, which may trigger an overpayment of benefits that the student would be required to repay. However, the VA recently approved these grading options as eligible for payment of benefits when issued due to COVID-19. EW grade options will continue to be classified as non-punitive and will need to be marked as COVID-19 related to ensure that the overpayment of benefits is not triggered. Please refer to the [VA SCO Handbook](#) to ensure that colleges are not triggering an overpayment due to the non-punitive status.

Currently there is no approval for reinstating the educational assistance entitlement when time is lost due to course cancellations or other COVID-19-related interruptions to course completion. SCOs should follow their local guideline policies and work with college administrators to avoid or limit any reduction of benefits for student veterans.

Compliance Audit Requirements

In April of 2020, the VA emailed a remote review solicitation letter inquiring whether colleges were willing to participate in a compliance review audit. The VA has recently confirmed that while compliance surveys are required, colleges are able to request a deferment. At this time, please

² COVID-19 FAQs, #6

Guidance for VA Educational Benefits

June 10, 2020

contact the VA if your college is unable to complete a remote survey. While the Chancellor's Office has requested a waiver for all California community colleges, this request has not been approved as of the date of this guidance memo. Additionally, the VA certification and compliance reporting will be fully online and colleges should prepare for this change. Ongoing Veterans Services categorical funding may be used to support the move towards an online filing system to facilitate ongoing certifications and future compliance surveys.

The information in this guidance memo was developed in consultation with the Chief Education Liaison Officer and the Education Liaison Representative from the VA. The Chancellor's Office will provide further updates that impact veteran students as they arise during this crisis. For questions regarding this memo, contact the California Education Liaison Representative at elr.vbasdc@va.gov, [Muskogee Regional Processing Office](#) or the Chancellor's Office Veterans Program Lead, Jacqueline Chacon at veterans@ccccco.edu.

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