

**R. Wes Hayes, Jr.**  
Chairman

**Rusty L. Monhollon, Ph.D.**  
President & Executive Director



Agenda Item 6.03.C  
CHE Meeting

## MEMORANDUM

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**To:** Chair Wes Hayes and Members, SC Commission on Higher Education

**From:** Chair Paul Batson, and Members, Committee on Access & Equity and Student Services

**Date:** September 2, 2021

**Subject:** SC State Approving Agency Update

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**Background:** The South Carolina Commission on Higher Education Veterans Education and Training Section is designated as the State Approving Agency (SAA), by the Office of the Governor. The SAA is a part of the National Association of State Approving Agencies (NASAA), which is comprised of state agencies that have the responsibility for approval and training available through the Post-9/11 GI Bill® (VA education benefits). The SAA acts on behalf of the federal government to evaluate educational/vocational institutions and training establishments for the purpose of allowing veterans and eligible independents to receive VA education benefits.

**Overview:** In accordance with Title 38 Code of Federal Regulations (CFR), Sections 21.4253, 21.4254, 21.4261, and 21.4262, the SAA is responsible for reviewing, approving, revising, disapproving and monitoring programs at the colleges, universities, schools, apprenticeships and on-the-job training establishments within South Carolina. Moreover, in cooperation with the Department of Veterans Affairs (VA), the SAA assists veterans and those eligible with school/employment programs and Post-9/11 GI Bill® education benefits information. The SAA further assists the VA with conducting compliance surveys at educational institutions and training establishments to ensure financial and enrollment certifications are met in accordance with the VA's Education Services approval requirements.

### VA's Educational Institution Terminologies:

**Institutions of Higher Learning (IHL)** - Colleges and universities that offer post-secondary degree(s).

**Non-College Degree (NCD)** - Schools that offer postsecondary diplomas and certificates.

**Apprenticeship (APP)** - On-the-job training programs supervised by qualified employers that range from six (6) months and up to five years (5) in training time.

**On-the-Job-Training (OJT)** - Programs that are supervised by qualified employers that range from six (6) months and up to two (2) years in training time.

**VA's Academic Year** - VA's Academic Year runs from August 1<sup>st</sup> through July 31<sup>st</sup>.

**Federal Fiscal Year (FFY)** - VA and SAA operates on a FFY. The FFY runs from October 1<sup>st</sup> through September 30<sup>th</sup>.

**Monthly Housing Allowance (MHA)** paid each month to veterans and those eligible to receive VA education benefits during their enrollment at an educational institution or training establishment.



803-737-2260

1122 Lady St, Ste 400  
Columbia, SC 29201

[www.che.sc.gov](http://www.che.sc.gov)



The SAA update and presentation (attached) provides information on recent VA legislation, the Johnny Isakson and Davide P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020, and data comparison from academic years beginning in 2018 up to April 30, 2021.

The data comparison utilized for this update are the VA's public Institution tuition rates from academic years 2018, 2019 and 2021, the number of veterans, and those eligible receiving their VA educational benefits at the IHLs (2018-2021), and the compliance surveys conducted that resulted in over and underpayments to the educational institutions, veterans, and those eligible to receive their VA education benefits.

The update also provides the top ten South Carolina educational institutions with enrollments of veterans and those eligible receiving VA education benefits for the month of April of each year beginning in 2019, 2020, and 2021.

### **Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020**

On January 5, 2021, the President signed the Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020 (P.L.116-315) into law. This new law brings significant changes to Veterans' education benefits.

Many of the changes enhance or expand education benefits for veterans, service members, families and survivors and provide for the improvement and/or expansion of various GI Bill® programs.

<https://benefits.va.gov/GIBILL/docs/IsaksonRoe/IsaksonRoeFactSheet.pdf>

#### **Section 1005. Requirements for in-state tuition**

The Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020 (P.L.116-315) removes the requirement for covered individuals to enroll in a course at a public institution of higher learning within three years of being discharged to receive in-state tuition.

Also, the VA will make publicly available on the VA website a database explaining any public institution's requirements for beneficiaries to be charged in-state tuition. Effective: **August 1, 2021**

#### **Section 1010. Verification of enrollment to receive VA educational assistance benefits**

Creates a dual certification for the receipt of VA education benefits. The school certifies the student's enrollment after the add-drop date, and then each month thereafter, the student would be required to electronically verify with the VA their continued enrollment in that school. If a student fails to certify for two consecutive months, the VA will withhold monthly housing allowance payments until the student certifies. Effective: August 1, 2021.

#### **Section 1019. Overpayments to eligible persons or Veterans**

This section adds a requirement that colleges, schools and training programs be financially responsible, instead of the student, for benefits paid directly to an educational institution pursuant to the VA education benefits for tuition and fees or the Yellow Ribbon program, and advance payments of initial educational assistance, without consideration of whether the overpayment was the result of the willful or negligent failure of the college or school. Effective: **January 5, 2021**.

### **VA Public Education Institution Tuition Rates for Academic Years 2018, 2019 and 2020:**

The VA's academic year begins August 1<sup>st</sup> through July 31<sup>st</sup> of each calendar year. The Post-9/11 GI Bill Public Institution Tuition Rates for the academic years of 2018, 2019 and 2020 are as follows:

- 2018 - \$23,671.92
- 2019 - \$24,476.79
- 2020 - \$25,162.14
- Beginning on August 1, 2021, the new tuition rate will be \$26,042.81. This is an increase of 3.5%. In addition to the tuition rate increase, veterans and those eligible will also receive a supplies/book stipend up to \$1,000.00 proportionately (\$500.00 for the fall and spring terms), in accordance with the current academic year.

South Carolina Veterans Selected Reserves and Those Eligible Receiving VA Educational Benefits for April 2019 - April 2021:

- 2019 - 11,004
- 2020 - 10,851
- 2021 - 9,489

VA FFY 2019, 2020, and 2021 Compliance Surveys Conducted at the VA Educational Institutions and Training Establishments:

- 2019 = Total 31
  - IHL - 19
  - NCD - 6
  - APP - 1
  - OJT - 5
- 2020 = Total 31
  - IHL - 19
  - NCD - 6
  - APP - 1
  - OJT - 5
- 2021 = Total 32
  - IHL - 16
  - NCD - 7
  - APP - 1
  - OJT - 8

VA FFY 2019, 2020 and 2021 Compliance Surveys Overview for Educational Institutions and Veterans and Those Eligible Receiving VA Educational Benefits:

- **2019 - Educational Institutions' Over and Underpayments:**
  - Overpayments - \$19,267.42
  - Underpayments - \$3,127.00
  -

**Veterans and those eligible to receive VA Education Benefits**

  - Overpayments - \$5,312.93
  - Underpayments - \$4,025.95
  -
- **2020 - Educational institutions' Over and Underpayments**
  - IHL and NCD overpayments - \$112,560.70
  - IHL and NCD underpayments - \$600.23

**Veterans and those eligible to receive VA Education Benefits**

  - Overpayments - \$75,854.85
  - Underpayments - \$3,253.71
- **2021 - Educational institutions' Over and Underpayments**

- Overpayments - \$685,908.32
- Underpayments - \$10,234.25

**Veterans and those eligible to receive VA Education Benefits**

- Overpayments - \$115,024.03
- Underpayments - \$4,162.70

- **2021 - Educational institutions, Veterans and those eligible to receive VA Education Benefits - total Over and Underpayments - as of April 30, 2021**
  - Overpayments - \$800,932.35 - Educational institutions, veterans and those eligible to receive VA educational benefits
  - Underpayments - \$14,396.95 - Educational institutions, veterans and those eligible to receive VA educational benefits

**The Top Ten Educational Institutions with Enrolled Veterans and Those Eligible Receiving VA Educational Benefits for April 2019, 2020 and 2021: [Note: The educational institutions are in alphabetical order.](#)**

Educational Institutions	Veteran Population Receiving GI Bill Benefits		
	2019	2020	2021
1 Charleston Southern University	440	394	391
2 Clemson	554	580	608
3 Coastal Carolina	461	538	545
4 College of Charleston	388	646	363
5 Greenville Technical College	366	368	265
6 Horry-Georgetown Technical College	302	302	230
7 Midlands Technical College	719	728	631
8 The Citadel	590	485	438
9 Trident Technical College	1186	637	527
10 USC Columbia	1087	1116	1143

**Summary:**

During FY21, the SAA was assigned 32 compliance survey visits (four risk-based surveys and 28 compliance surveys). As of April 30, 2021, there were 15 of 25 compliance surveys that resulted in financial findings. Below are the financial findings that resulted in over and underpayments for 15 of 25 educational institutions.

- Overpayments - \$800,932.35 – Educational institutions, veterans and those eligible to receive VA educational benefits
- Underpayments - \$14,396.95 – Educational institutions, veterans and those eligible to receive VA educational benefits

Prior to January 5, 2021, educational institutions, veterans and those eligible to receive VA education benefits shared the responsibility for the tuition and fees over and underpayments. Effective January 5,

2021, educational institutions that have been approved to offer veterans' education and training will be responsible for all over and underpayments pertaining to tuition and fees certified to VA Education Services. The educational institutions will have to contact the veteran(s) and those eligible to retrieve/collect VA education benefits for reimbursement relating to tuition and fees over and underpayment amount(s).

VA School Certifying Officials at the colleges, universities, and schools will need to ensure that VA students are certified accurately and promptly for their VA education benefits to avoid over and underpayments. Failure to certify VA students accurately and promptly may result in a debt to the certifying educational institution.

Attachment



**South Carolina**  
Commission on Higher Education  
*Access | Affordability | Excellence*

June 3, 2021

# State Approving Agency

Background - Overview - Updates

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- The SAA acts on behalf of the federal government to evaluate educational/vocational institutions and training establishments for the purpose of allowing veterans and eligible independents to receive VA education benefits.



# Overview of SAA

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- In cooperation with the Department of Veterans Affairs (VA), the SAA assists veterans and those eligible with school/employment programs and VA education benefits information.
- Assists the VA with conducting compliance surveys at educational institutions and training establishments to ensure financial and enrollment certifications are met in accordance with the VA's Education Services approval requirements.





# SAA Updates

- VA legislation, the Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020, and data comparison from academic years beginning in 2018 up to April 30, 2021.
- The data comparison utilized for this update are the VA's public institution tuition rates from academic years 2018, 2019 and 2021, the number of veterans, and those eligible receiving their VA educational benefits at the IHLs (2018-2021), compliance surveys conducted that resulted in over and underpayments to the educational institutions, veterans, and those eligible to receive their VA education benefits.
- The update also provides the top ten South Carolina educational institutions with enrollments of veterans and those eligible receiving VA education Benefits for the selected month of April of each year beginning in 2019, 2020, and 2021.



# Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020

- Section 1005. Requirements for in-state tuition.
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APP - 1	APP - 1	APP - 1
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Total - 31	Total - 31	Total - 32



# VA FFY2019, 2020 and 2021 - Compliance Survey Overview for Educational Institutions

2019 - Educational Institutions	2020 - Educational Institutions	2021- Educational Institutions
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Underpayments - \$3,127.00	Underpayments - \$600.23	Underpayments - \$10,234.25





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Underpayments - \$4,025.95	Underpayments - \$3,253.71	Underpayments - \$4,162.70



# 2021 - Educational Institutions' Total Over and Underpayments - as of April 30, 2021

Educational Institutions - Veterans - Those Eligible to receive VA Ed. Benefits	Educational Institutions - Veterans - Those Eligible to receive VA Ed. Benefits
Overpayments - \$800,932.35	Underpayments - \$14,396.95



# Top Ten Educational Institutions with Enrolled Veterans and Those Eligible Receiving VA Educational Benefits for April 2019, 2020, and 2021

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# Questions

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