Topics: Education Abroad

Competencies: Compliance Management, Recruitment, Enrollment, and Advising

The 2024 guidance from the U.S. Department of Veterans Affairs, Veterans Benefits Administration (VBA) outlines the acceptable uses of student veteran benefits for study abroad.

Advocacy to Expand Use of VA Benefits for Education Abroad

January 2024: In an update to the <u>School Certifying Official handbook</u>, the VA published its guidance on Section 9 of the Veterans Auto & Education Improvement Act of 2022 (PL-117-333). The guidance establishes an actionable pathway for additional types of education abroad programs currently unapproved by the VA to be temporarily approved for student participation while the foreign institution pursues VA approval. To learn more about "Section 9 arrangements," see below. In the coming weeks, NAFSA will meet with VBA representatives to examine the guidance and its implementation.

June 2023: On June 1, 2023 NAFSA hosted representatives of the VA at the NAFSA 2023 Annual Conference and Expo. During their session, they provided updated information about the new Veterans Auto and Education Improvement Act of 2022. NAFSA continues to track and engage with the VA on this new law and its implications for study abroad and will keep membership updated as implementation begins.

January 2023: Prior to adjourning for the year-end holidays, Congress passed <u>H.R. 7939</u> which includes a provision allowing student military veterans to use their GI bill benefits for more types of study abroad programs than what was permitted by the Department of Veterans Affairs. The president signed the bill into law on January 5. This policy change has been a long-time focus for NAFSA advocacy efforts

December 2022: On December 1, 2022 NAFSA joined the American Council on Education (ACE) and 10 other higher education and veterans program associations in a <u>letter to the chairs and ranking</u> <u>members</u> of the U.S. House and Senate Veterans Affairs Committees, supporting swift passage of the Student Veteran Emergency Relief Act (H.R. 7939) before Congress adjourns later this month. This bill includes a provision that would allow student veterans to use their GI bill benefits for more types of study abroad programs than is currently permitted by Department of Veterans Affairs guidance. The House passed the bill with strong bipartisan support in September.

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September 2022: On September 14, 2022, the U.S. House of Representatives passed a package of bills related to U.S. veterans benefits and care. One of the bills, <u>H.R. 7939</u>, includes a provision (Section 9 in the bill) that will permit student veterans to use their education benefits for more types of study abroad programming than what is currently allowed by Veterans Affairs guidance detailed below. NAFSA partnered with <u>Student Veterans of America</u> (SVA) in advocating for such a legislative fix. The package of bills next goes to the Senate. NAFSA and SVA continue to engage on this issue.

June 2021: NAFSA and Student Veterans of America (SVA) received a letter of response from Thomas J. Murphy, Acting Undersecretary for Benefits on June 24, 2021. NAFSA and SVA will continue to engage on this issue. <u>Read the letter from Thomas J. Murphy, Acting Undersecretary for Benefits</u>.

April 2021: NAFSA and Student Veterans of America (SVA) issued a comment letter to the U.S. Secretary of Veterans Affairs, Denis McDonough, calling on the Veterans Benefits Administration to review this extremely limiting policy on the use of VA benefits for study abroad. <u>Read the full letter</u> <u>from NAFSA and SVA to Secretary McDonough</u>.

Current Policies for Using Veterans Benefits for Education Abroad

Tuition Benefits

NAFSA's understanding of the VA Policy is as follows. This is based on a <u>January 2024 VA training</u> <u>offered to School Certifying Officials</u>.

Temporary new methods to study abroad using GI Bill Benefits (Section 9 of PL-117-333, Veterans Auto & Education Improvement Act of 2022, enacted 1/05/2023)

Study abroad opportunity offered under contract or written agreement where the contract or written agreement has not yet been approved for VA benefits

Study Abroad Program Type Use of GI Bill Benefits

Courses

Billing

Temporary new methods to study abroad using GI Bill Benefits (Section 9 of PL-117-333, Veterans Auto & Education Improvement Act of 2022, enacted 1/05/2023)								
Exchange program	Yes, within Section 9's five- year grace period*	Courses owned by foreign institution	Home institution bills the student					
Direct Enroll / Guest Student Enrollment	Yes, within Section 9's five- year grace period*	Courses owned by foreign institution	Home institution bills the student					
Study Abroad through U.S. Guest institution	Yes, within Section 9's five- year grace period*	Courses owned by a foreign institution, contracted through a U.Sbased guest institution	U.Sbased guest institution bills the student					

*Programs are no longer eligible for GI Bill Benefits if they are not approved within the grace period and certification will end.

Approved methods to study abroad using GI Bill Benefits (Title 38, Veteran's Benefits)								
Study Abroad Program Type	Use of GI Bill Benefits	Courses	Billing					
Direct Enroll / Guest Student Enrollment <i>with foreign</i> <i>institution approved by VA</i>	Yes, using Parent/Guest policy	Courses owned by foreign institution	Billed from foreign institution					
Faculty-Led	Yes	Home institution teaches and owns all courses	Home institution bills the student					

Approved methods to study abroad using GI Bill Benefits (Title 38, Veteran's Benefits)									
Branch Campus of US-based home institution		Yes		Branch campus of Home institutions teaches and owns all courses		Home institution bills the student			
Education Abroad programs not approved for use with GI Bill Benefits									
Study Abroad Program Type	Use of GI B Benefits	Bill	Courses		Billing				
Program Providers	No		Courses must be owned by an institution of higher learning		Program providers are not able to be certified to accept VA funds				

Housing

Some instances will now allow student monthly housing allowances to reflect the national average for foreign programs instead of the in-state maximum.

Section 9 Arrangements

New methods to study abroad using GI Bill Benefits come from Section 9 of PL-117-333, Veterans Auto & Education Improvement Act of 2022, enacted 1/05/2023. To review the full guidance in the VA's official SCO Handbook, <u>see here</u>. For a PDF of the study abroad guidance only, <u>see here</u>.

<u>What is the Veterans Auto & Education Improvement Act of 2022 and how does it connect with</u> <u>study abroad?</u>

The Veterans Auto & Education Improvement Act of 2022, <u>PL-117-333</u>, was signed into law by President Biden on January 5, 2023 and includes, in Section 9, updated text about approving study abroad usage with GI Bill benefits.

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The new law creates a five-year grace period to allow some types of study abroad programs to be certified for student participation while the foreign institution undergoes approval by the VA. In other words, during a five-year grace period, the home institution may certify a currently unapproved study abroad program, as long as the home institution assumes academic responsibility for the courses while the foreign institution is simultaneously seeking VA approval.

At the conclusion of a program's five-year grace period, the foreign institution and the study abroad program must be approved by the VA.

Please note: Not all types of education abroad programming can be approved for GI BIll Benefits under Section 9. Third-party program providers are not included in this legislative update.

What is the process? How does the five-year grace period work?

During the grace period, the home institution's School Certifying Official (SCO) can certify the student's participation in the study abroad program as long as the home institution assumes academic responsibility for the courses and bills tuition. SCOs can certify a student's unapproved program by requesting an "extension facility code" from their respective Education Liaison Representative (ELR). The complete process is explained in the <u>updated SCO guidance</u>.

The five-year grace period begins the first participatory day of the first term (i.e. semester, summer) the program has been certified. The five-year grace period is unique for each program, and it begins when a student participates in a program.

At the end of the five-year period, if the program has not been approved, the program can no longer be certified.

Example: Student Veteran A participates in an Exchange Program to University X in the Fall of 2023. The five-year grace period begins the first day of the Fall 2023 semester at University X. If the program has not received VA approval by the summer of 2028, the program can no longer be certified.

What information does my SCO have about this change?

The VA has released updated guidance connected with the Veterans Auto & Education Improvement Act of 2022 <u>here</u>.

Additionally, study abroad was discussed during the January 2024 School Certifying Official Office Hours. <u>Watch the recording.</u>

What does this mean for Study Abroad now?

Education abroad offices should connect with their SCOs to discuss the programs that can be certified. SCOs can begin requesting an "extension facility code" when they have a student who

needs it.

US institutions should connect with their foreign partners about becoming approved by the VA. NAFSA's conversation with the VBA about this process is on-going.

Looking beyond the five-year grace period.

NAFSA is actively discussing a sustainable solution with the VA to keep education abroad programs accessible to students. The shared goal is a long-term pathway for student veterans and their dependents to participate in programs most suited to their educational needs.

If you have questions or contributions to share connected to this advocacy, please use <u>Report an</u> <u>EA Issue</u>. To stay engaged on this issue, please subscribe to <u>Network NAFSA</u>.



Recommendations for working with your institution's VA School Certifying Official (SCO)

The information below is provided to assist education abroad professionals as they support and address the needs of this specialized subset of students.

Introduce yourself and get to know your School Certifying Office (SCO) *before* issues arise. Make sure your first encounter is not dealing with a problem. Give them an overview of study abroad process and programs - and ask them to educate you on VA benefits.

Think about how to collaborate and present information to students. For example, have your SCO review any information about military benefits you are posting on the education abroad office website. Consider offering joint information sessions for students on how to use military benefits or a public-viewing resource (e.g. webpage) with relevant information.

Outline together the process of working with study abroad participants who are using military benefits. Discuss how the respective offices will be notified that an eligible student has applied. Create a communication plan.

These are some specific questions you may want to discuss with your SCO:

What are the different types of study abroad options offered, and which ones can be funded through the GI Bill? Are domestic exchanges an option for your students?

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What are the differences in benefits for veterans and for dependents of veterans? For what type of programs can a tuition waiver be used?

What is the process for submitting a tuition charge to the VA?

How will veterans be registered at their home institution during study abroad? Will the semester start/end dates embedded in the course registration match the actual start/end dates of the student's semester abroad?

Examples of Education Abroad Offices Clarifying Military Benefits

The institutions below represent examples of how education abroad offices may wish to relay military benefits information to students:

<u>Portland Community College</u> includes student veterans on the "Diversity & Identity" section of their education abroad website with links to resources <u>Arizona State University</u>'s list of steps for using the GI Bill includes a testimonial from a veteran and a dependent <u>The University of Kansas</u> provides a clear eligibility list and tracks veteran students within their online application database for easy follow-up <u>Portland State University</u> includes a list of "things to consider" for student veterans, and student spotlight, in addition to a checklist for using aid

GI Bill Benefits Terminology & Study Abroad History

From the Veterans Benefits Administration

Helping Military Veterans Study Abroad

Veterans are a growing population on U.S. college campuses, and education abroad offices are finding ways to better understand how best to help them use their educational benefits to fund study abroad.

Read the feature story in International Educator magazine