

Before we begin...

- The webinar will start at **2 pm** (eastern time)
- Please make sure to:
 - Mute your phone
 - Turn off any webcams or microphones (if applicable)
- Audio can **ONLY** be accessed by calling 1-800-767-1750
- Conference code: 51636
- Slides are attached to this meeting; upper right-hand side of the box look for a paperclip – click it to download the PowerPoint



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IHLs with Contracted Flight Programs

December 14, 2015

Agenda

- September 1, 2015 Policy Advisory
- IHL Degree Programs Involving Private Pilot Courses Provided Under Contract With Flight Schools
- Questions & Answers

Housekeeping

- Participants may submit questions and feedback during the webinar. We want this to be beneficial for you.
- For any specific or situational questions you may have, please contact your ELR
- Please mute your phones and **DO NOT** put the call on hold.



September 1, 2015 Policy Advisory

- Schools should have already provided specified hours and fees to ELRs and/or SAAs
- If you have not already done so, this information should be submitted by as soon as possible, as the original deadline was November 1.
- Regardless of the status of your catalog amendment, veteran students cannot be certified for excessive hours. .

Ref: 38 U.S.C 3680A(f)(2); 38 C.F.R 21.4233(e)



Definitions

- IHL - Institution of Higher Learning that grants degrees
- Vocational Flight School – Standalone flight school that does not issue degrees



Definitions

- In-House = Within, conducted within, or utilizing an organization's own staff rather than external or non-staff through contract.
 - The FAA-approved flight and ground instructors must be employed by the IHL as faculty or adjunct faculty.
 - The IHL publishes a syllabus for each flight course that specifies the minimum number of hours of flight and ground school required to complete each course
 - The IHL may own or lease aircraft and space at an airport

Q&A (cont)

Q. Must an “in-house” credit hour flight course be given under 14 CFR Part 141 or may it be conducted under Part 61?

A. In-house credit hour flight courses may be conducted under either Part 61 or 141; however, the IHL must still specify the minimum flight hours required to complete each such course, whether conducted under Part 61 or 141. This assumes it has been approved by the school’s accrediting agency.

Q&A

Q. Is an IHL free to choose any number of hours it wants and declare it the “required hours of training,?”

A. If the IHL has a contract with a vocational flight school, the IHL’s catalog addenda must adopt the training requirements already established for the approved contract course, ie, the hours in the FSDO stamped syllabus.

Q. If a student can complete the rating in less than listed number of hours is that allowed or do they have to finish flying additional hours

A. The student should fly the number of hours required to obtain a satisfactory grade in the course.

Q&A (cont)

- Q. Not all students complete competencies at the same rate. What if some need more hours than others?
- A. VA does not pay benefits to proficiency. Because the objective is a degree program, payments are being made for pursuit of a degree and not a flight certificate. Therefore, just as for other college degrees, the school must identify specific hours required for the degree

Q&A (cont)

Q. Different aircraft are required for those with weight issues, or MX related issues

A. Where the FAA requires that an individual student to use a more expensive aircraft for whatever reason, the difference between the cost of that aircraft and the less expensive aircraft utilized by other students must be paid by the student.

Q&A

Q. Can the billing come from the IHL for coursework and the contracted flight school for the flying?

A. No. VA is paying for a degree program and all payments should be made to the IHL.

Q. Will 85/15% be calculated based on degree or based on Aviation program as a whole? I.e. flight and aviation management measure separately or as a whole?

A. Each program/track/concentration that varies from other programs/tracks/concentrations in course requirements, cost, etc., will require that a separate calculation be made

IHL Degree Programs Involving Private Pilot Courses Provided Under Contract with Flight Schools



BACKGROUND

- VA recently conducted compliance reviews at IHLs offering degree programs that include flight training.
- It was discovered that some programs include private pilot instruction provided by vocational flight schools through a contract.
- Private Pilot courses cannot be approved at vocational flight schools and, consequently, cannot be approved for GI Bill benefits as part of a program at a contracting IHL.



ACTION - Electives

- Effective immediately, School Certifying Officials (SCOs) may not certify the credits or charges associated with any **elective courses** involving contracted private pilot training to VA.
- SCOs should submit a Notice of Change in Student Status removing the credits or charges associated with any such courses for any enrollment period beginning after December 31, 2015, indicating that the change is effective before the beginning of such term.



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ACTION –Private Pilot

- School Certifying Officials (SCOs) may continue to certify the credits and charges to VA for courses involving contracted private pilot training that began during the current academic year if (and only if) the specific course is required for degree program completion.
- Private pilot can be taken during terms that begin before August 1, 2016.



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ACTION –Program Amended

- Each IHL with an affected program will be required to amend the program's curriculum in order to come into full compliance with GI Bill approval requirements before the start of the Academic Year beginning on August 1, 2016.



ACTION – How to comply

In order to comply, schools may do the following:

- Bring private pilot instruction “in house” (i.e. the instruction is provided directly by the IHL),
- Contracting with an IHL that has its own approved “in house” program to provide such training,
- Remove private pilot courses from the program curriculum and, instead, make the possession of a private pilot’s license a requirement for admission into the program.



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ACTION – Program Approval

- Schools must submit the revised program curriculum to the State Approving Agency of jurisdiction to verify that the program meets all applicable approval criteria.
- Failure to come into compliance will result in the withdrawal of program approval effective August 1, 2016.

Q&A

Q. Can students be certified for Private Pilot with a contracted vocational flight school for a Spring and Summer 2016 term?

A. Yes, as long as the course is required for a degree

Q. When does my school have to amend the degree program to remove the Private Pilot portion with a contracted vocational flight school.

A. Catalog revisions must be submitted to the SAA prior to August 1, 2016 and effective with the Fall 2016 semester.



Q&A (cont)

Q. If we offer an in-house private pilot credit hour course, may we hire instructors from the third party pilot school that conducts the flight training for our other flight courses?

A. Yes, you may hire qualified instructors from any source; however, your third party contract pilot school partner may not be part of the hiring process or be mentioned in any way, shape, or form in the personal contracts drawn up with the instructors, nor may it be part of or receive any reimbursement for instruction given. Instructors must be considered adjunct faculty and meet the schools criteria for such, e.g., must possess at least an appropriate bachelor's degree.



Q&A (cont)

Q. Could a combined private pilot/instrument rating course (as allowed under 14 CFR Part 141, Appendix M) be approved at a third party flight school, then approved for inclusion in the IHLs degree program?

A. No. A combined private pilot/instrument course would lead to a person earning a private pilot's license with an instrument rating. That is still avocational or recreational because you cannot legally obtain employment with that license and rating alone. That is what makes it non-approvable.



Q&A (cont)

Q. Can a private pilot course remain in a program, but not just not be eligible for reimbursement by VA?

A. No. Only complete programs of education may be approved; therefore, if part of the program, in this case the private pilot course, cannot be approved, then the entire program cannot be approved. If the private pilot course is removed from the program and made a prerequisite for matriculation into that program, then the program can be approved because it does not contain an element that cannot be approved.

Q&A (cont)

Q. We are legally obligated to students to adhere to the catalog that was in place at the time of their admission. A change now could not be applied to non-VA flight students already enrolled. The change could only be put into place for students who enter after such changes are published.

A. Putting a change into place for some students is not an option. If your school's policy does not allow for a catalog amendment, then the school's option is to bring the program "in-house," or have the program disapproved.



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Q&A

- Q. What happens if my school does not remove the Private Pilot portion of the degree program.
- A. If a degree program requires private pilot and is taught through contract with a vocational flight school after August 1, 2016, the program will not be approved.



Contact Us

Please contact your ELR or SAA with questions
Specific to your school.

You may also send questions to:

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WEBSITE: www.benefits.va.gov/gibill

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Questions & Answers

