

Two Certification Requirement Effective August 1, 2021

Public Law (P.L) 116-315, section 1010 requires schools to submit an initial enrollment certification for each chapter 33 student, and a subsequent enrollment certification (verification) after the last day a student can withdraw from the course or program of education without penalty, known as the drop-add period. VA is defining “without penalty” as either an academic penalty or a financial penalty, whichever occurs first at the educational institution.

The second 1010 submission must be received no later than 30 days after the school’s drop-add period or 60 days from the first day of the enrollment period, whichever occurs first. For schools without a drop-add period, the second 1010 submission must be received no sooner than 30 days and no more than 60 days from the first day of the enrollment period.

NOTE: This requirement is only for schools approved as Institutions of Higher Learning or Non-College Degree facilities. There are no changes to the current process for submitting enrollment certifications for On-the-job training, apprenticeship, flight, and correspondence training establishments.

A second 1010 submission must be reported using one of the following methods:

1. Zero T&F Certification (Dual Certifications). Many schools choose to use the optional practice of submitting initial enrollment certification with \$0.00 in the tuition and fees fields. Once the student's financial aid is known, the tuition and fees are certified by amending the term to add the tuition and fees amount. This is called **Zero T&F certification (dual certification)**. If the amended (adding tuition and fees only) certification is submitted within the time limits explained above, this will meet the second 1010 submission requirement.

2. Enrollment Changes. If a student makes changes to their enrollment during the drop-add period or within the first 30 days of the term, the school should follow current guidance to report changes to VA. The submission of a change to an enrollment period if reported after the drop-add period will suffice as the second certification and meet the two (2) certification requirement when received within established the time limit.

3. Unchanged Certifications. If the school has no changes to make to the enrollment or tuition and fees for a term, a second enrollment certification is still mandated. In Enrollment (EM), this should be done by amending the enrollment, making no changes, and submitting the term. Comments or remarks should be avoided (unless necessary) on these “unchanged” amendments to allow the greatest likelihood of automation by VA. Schools which have not chosen to use EM must still submit a second certification, marked “no changes” in remarks.

4. Retroactive Certifications. When schools are submitting enrollment certifications for terms that are already completed, the two (2) certification requirements remain. An amended certification should be submitted the

next day to maximize automation, as described for “unchanged” certifications above.