



Forum on Education Abroad Advocacy Resource

The Use of Post-9/11 GI Bill Benefits for Study Abroad

Introduction and Background

In 2008, the United States Congress passed a Supplemental Appropriations Act containing a section that mandated additional educational assistance benefits for recent veterans. Title V of the Act stipulated:

“It is in the national interest of the United States to provide veterans who serve on active duty in the Armed Forces after September 11, 2001, with enhanced education assistance benefits that are worthy of such service and are commensurate with the educational assistance benefits provided by a grateful Nation to veterans of World War II.” [Title V Sec. 502(6)].

From this came Public Law 111-277, the Post-9/11 Veteran’s Educational Assistance Improvements Act of 2010. Called the Post-9/11 GI Bill, it was designed to help veterans and active duty personnel pay for higher education by reimbursing tuition, fees, and living costs. Unfortunately, the Office of Veterans Affairs’ (VA) final regulations caused confusion about whether study abroad costs could be covered, stating:

Fees do not include those charged for a study abroad course(s) unless the course(s) is a mandatory requirement for completion of the approved program of education.” [Federal Register/ Vol.74, No. 60/ Tuesday, March 31, 2009/ Rules and Regulations, p.14672]

It is unclear why this was inserted in the final regulations since no mention is made of restrictions for study abroad in either the Supplemental Appropriations Act of 2008 or the Post-9/11 GI Bill. When it was noticed, colleges and universities made inquiries to the Department of Veterans Affairs, who issued a clarification memo on June 23, 2010 outlining three basic rules for providing GI Bill benefits for study abroad:

1. Students must be enrolled in courses that will apply to their degree program.
2. The programs at the “host” institution in the foreign country must be approved.
3. VA cannot pay any fees specific to studying abroad unless the student is required to study abroad as part of their degree program.

Even though there is a restriction on paying “study abroad “fees,” the memo defines two ways to reimburse study abroad tuition costs, depending upon whether home school tuition is charged or the home school charges a fee for participation that includes host institution tuition and fees:

1. If home school tuition is charged, the VA will pay the in-state rate charged for the student's course of study just as it would for instruction on the home campus.
2. If host school tuition and fees are collected and passed on, those normally assessed to students at the host institution can be reimbursed at a rate set annually by the VA (for 2011-12, up to \$17,500).

In either case, students can also apply to the VA to be reimbursed for living costs, books and supplies, and travel. Fees specific to study abroad (like an administrative or application fee) cannot be paid unless the program is a required part of the student's degree program.

The net effect of the clarification memo is to make students eligible for the same benefits they would receive at the home institution. Since that is the case, why is there so much confusion about how the benefits apply to study abroad? The Forum has found through discussions with many of its members that there is a wide divergence at U.S. colleges and universities in how VA benefits are being applied. Some institutions are not providing any benefits while others are covering all study abroad fees plus standard reimbursements for living costs, books and supplies, and travel. These differences in practice indicate that there is a misunderstanding of the VA's intent to provide benefits to post-9/11 veterans who include study abroad in their educational program. This misunderstanding is likely due to the fact that the only mention in the actual regulations of study abroad is a prohibition of reimbursement unless the program is a required part of the student's degree plan. However, the June 2010 clarification memo resolves any ambiguity.

Guidelines for the Implementation of the Post-9/11 GI Bill in Study Abroad

Based on its review of the Post-9/11 GI Bill, the Forum offers the following guidance to its members:

1. Review the three general rules in the clarification memo and make sure your study abroad programs comply.
 - Home institutions should have proof that the credit earned on the programs can be applied to degree requirements (either major, general education, or elective). Institutions may also need to show how study abroad courses are reviewed and preapproved by the student's major advisor.
 - Home institutions and their student-veterans should be able to show that institutions where students directly enroll abroad are sanctioned by the host country's ministry of education or equivalent.
 - Program budgets should show tuition, each specific fee, other expenses (housing, in-country transportation, etc) and fees specific to study abroad as separate line items.
 - Public institutions that charge out-of-state students a different tuition for study abroad, should have that information readily apparent in the program budget.
2. Identify the official(s) on campus who certifies VA benefits for the U.S. Department of Veterans Affairs. This person might be in the Registrar or Financial Aid office, or may be in a Veterans Services department. There may be no veteran's service office on campus, but each institution must have a certification officer.

3. Home institutions and their student-veterans should download and copy the VA clarification memo (see the end of this report for the website link) and prepare other documents to have available for meeting with the certification officer.
4. The campus certification officer may be hesitant to change a policy that he or she thinks is in compliance with federal requirements. The fear of federal audits is quite reasonable, since an institution can be sanctioned if VA benefits are being incorrectly awarded. If the campus certification officer shows this hesitation, offer to meet with the person whom that officer consults. This may be someone on campus or someone in a state or regional Veteran's Affairs office.
5. If the certification officer still will not apply the benefit, research how VA benefits are being handled at other institutions in your area, or at similar institutions. If similar institutions in the state or region allow the use of benefits for study abroad, this may help convince the on-campus certification officer that it is acceptable to do the same.

Persistence is a key to applying the Post-9/11 GI Bill benefit to study abroad. There may be only a few veterans on a campus who wish to study abroad, but, it is worth taking the time to ensure that maximum benefits can be used. This is the least we can do for our students who have served in the military.

Where to find key documents:

Tuition, Fees, Housing, Books and Supplies under Post-9/11 GI Bill; Study Abroad Programs (June 23, 2010 Department of Veterans Affairs clarification memo)
http://www.gibill.va.gov/documents/factsheets/post_911_study_abroad_fact_sheet.pdf

Regulations governing the Post-9/11 GI Bill (Federal Register/ Vol.74, No. 60/ Tuesday, March 31, 2009/ Rules and Regulations, p.14672)
<http://www.gpo.gov/fdsys/pkg/FR-2009-03-31/pdf/E9-7052.pdf>

Public Law 111-377, Post-9/11 Veterans Educational Assistance Improvements Act of 2010
<http://www.gpo.gov/fdsys/pkg/PLAW-111publ377/pdf/PLAW-111publ377.pdf>

Supplemental Appropriations Act of 2008:
<http://www.gpo.gov/fdsys/pkg/BILLS-110hr2642enr/pdf/BILLS-110hr2642enr.pdf>