

Response to comment on VA Enrollment Certification, VA Form 22-1999

VA did not specifically define the term credit hour in 38 CFR 21.9570 because the term may refer to both semester and quarter "credit" hours. Under the Post-9/11 GI Bill, VA was initially required to determine the amount payable each term, quarter, or semester based on the number of "credit hours" the student was pursuing. Students in pursuit of training at foreign schools on a semester system should have been certified based on the "equivalent" semester credits awarded for such training. Similarly, students in pursuit of training at foreign schools on a quarter system should have been certified based on the "equivalent" quarter credits. Schools that certify students using actual contact (clock) hours should have used the conversion formula in 38 CFR 21.9570 to determine the equivalent credit hours.