

DEPARTMENT OF THE ARMY U.S. ARMY COMBINED ARMS CENTER THE ARMY UNIVERSITY 100 STIMSON AVENUE, BUILDING 127 FORT LEAVENWORTH, KANSAS 66027-2301

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MEMORANDUM FOR

Chief, Army Continuing Education System (ACES), G-1, U.S. Army Installation Management Command (IMHR-E/Ms. Moorash), 2405 Gun Shed Road, Fort Sam Houston, TX 78234-1223

Army National Guard Education Services Branch, National Guard Bureau (ARNG-HRM-E/Mr. Hardy), 111 South George Mason Drive, Arlington, VA 22204-1382

U.S. Army Reserve Command G-1, Services and Support Division (AFRC-PRS/CPT Green), 4710 Knox Street, Fort Bragg, NC 28310-5000

SUBJECT: Army Credentialing Assistance Program Implementation Guidance

1. References:

- a. Secretary of the Army Directive 2018-08, The Army Credentialing Assistance Program, 6 June 2018.
- b. Secretary of the Army Directive 2018-09, Army Tuition Assistance Policy, 6 June 2018.
- c. Department of Defense Instruction 1322.25, Voluntary Education Programs, 15 March 2011, Incorporating Change 3, Effective 7 July 2014.
- d. Army Regulation (AR) 621-5, Army Continuing Education System, 11 July 2006, including Rapid Action Revision issued 6 September 2009.
- e. Memorandum, AHRC-PDZ-A, Army Tuition Assistance (TA) Policy Revision Implementation Guidance, 20 June 2018.
 - f. AR 350-100, Officer Active Duty Service Obligations, 26 September 2017.
- g. AR 135-91, Service Obligations, Methods of Fulfillment, Participation Requirements, and Enforcement Provisions, 14 March 2016.
 - h. AR 600-8-2, Suspension of Favorable Personnel Actions (FLAG).
 - i. AR 621-1, Training of Military Personnel at Civilian Institutions.

- 2. Purpose. Effective 1 October 2019, this memorandum implements the Army Credentialing Assistance (CA) Program in accordance with reference 1a. In addition, this memorandum supersedes the previous CA Program Implementation Guidance issued on 20 June 2018 (reference 1e) and ends the CA Limited User Test (LUT).
- 3. Applicability. This guidance applies to all Regular Army, Active Guard/Reserve (AGR) pursuant to Title 10 and Title 32, U.S. Army Reserve (USAR), and Army National Guard (ARNG) Soldiers in an active drilling status with a designation as satisfactory participant.

4. CA Eligibility.

- a. Soldier eligibility criteria for the use of CA is aligned with TA policy which states Soldiers may be eligible for up to two tiers of TA/CA. Soldiers must complete specified professional military education and the required Military Education Level (MEL) must be reflected in GoArmyEd (GAE) before CA can be approved.
- b. Soldiers are able to use CA to fund two credentialing occupational pathways based on their tier level as listed below:
- (1) Soldiers may begin work on their first credentialing occupational pathway upon achieving their Tier 1 eligibility through Military Occupational Specialty (MOS) Qualification as follows:
 - (a) Enlisted Soldiers who have graduated Advanced Individual Training.
 - (b) Warrant Officers who have graduated Warrant Officer Basic Course.
 - (c) Officers who have graduated Basic Officer Leaders Course.
- (2) Soldiers establish eligibility for a second credentialing occupational pathway by meeting Tier 2 eligibility as follows:
- (a) Enlisted Soldiers who have successfully completed Advanced Leaders Course (ALC).
 - (b) Warrant Officers who have graduated Warrant Officer Advanced Course.
 - (c) Officers who have graduated Captain's Career Course or equivalent.

- c. Soldiers meeting Tier 2 eligibility are only authorized one credentialing occupational pathway based on their MEL status. Soldiers whose MEL status is inaccurate as depicted in GAE must contact their unit S1/personnel office to correct their education record. As an interim measure, Soldiers may request a temporary, one-time GAE hold deferral (up to 90 days) from their servicing education center/office by way of a GAE helpdesk case. In addition, the memorandum entitled, "ETP Waiver of TA Tier 2 MEL Requirements," issued on 28 November 2018 also applies to those Soldiers applying for CA. Based on that memorandum, Soldiers who have been waitlisted in the Army Training Requirements and Resource System (ATRRS) for a minimum of one year and have completed the requisite distance learning phases to attend the resident phase of the ALC, the Warrant Officer Advanced Course, or the Captain's Career Course may have their Tier 2 MEL requirement waived for 90 days.
- 5. Exclusions. The following Soldiers are ineligible for CA:
- a. Contracted Reserve Officers' Training Corps (ROTC) scholarship Cadets, including those receiving room and board benefits in lieu of tuition and fees. This restriction includes any period(s) of temporary suspension of scholarship benefits, leave of absence, and while school is out of session.
 - b. ROTC Cadets contracted under the Green to Gold ROTC Program.
 - c. Soldiers who are flagged under provisions of AR 600-8-2.
- d. Soldiers who have been approved for voluntary separation or who have received notice of involuntary separation and do not have enough time remaining in service to complete the credential before separating from the Army.
- e. Soldiers without sufficient time-in-service to complete the course/exam for which CA was requested.
 - f. Soldiers assigned to the Individual Ready Reserve or the Inactive National Guard.
- g. Soldiers attending schooling under provisions of AR 621-1, Training of Military Personnel at Civilian Institutions.
 - h. Soldiers who have not reimbursed the Army in full for CA recoupment.

- 6. Credentialing Options (Enclosure 1).
- a. Soldiers are eligible to pursue three distinct credentialing options, 1) Civilian Occupation Related; 2) Academic; and 3) MOS Related. Each option could have multiple tiers or sequences indicating increased technical expertise. Soldiers are eligible to pursue all sequential levels as part of a single option. The three options may be worked on concurrently. Soldiers may only pursue credentials listed in Army Credentialing Opportunities On-Line (Army COOL). The credentialing options are:
- (1) Civilian Occupation Related Option (Credentialing Occupational Pathway). Soldiers may use CA for credentials aligned to a civilian career field. Supporting credentials may be stackable, sequential, or progressive within the career field, enabling Soldiers to gain technical expertise in the declared civilian career field/industry. Credentials in this option do not need to be related to the Soldier's branch, MOS, ASI, or assigned duties.
- (2) Academic Option (Academic Credential Plan). Soldiers may use CA for a credential which directly relates to an earned academic degree or academic certificate, with a limit of one credential per degree or certificate. Credentials in this option do not need to be related to the Soldier's branch, MOS, ASI, or assigned duties.
- (3) MOS Related Option (MOS Credential Plan). Soldiers may use CA for credentials that are directly related to their branch, MOS, and/or additional skill identifier (ASI). Soldiers are not authorized to use CA to pursue credentials that are an MOS requirement, as these credentials are funded by Army training institutions and career management field proponents. Soldiers may submit an MOS Credential Plan per MOS or ASI directly related credential annotated as "Most" on Army COOL. Soldiers must hold the MOS that is related to this "Most" credential.
- b. Credential Plan. Prior to using CA, Soldiers must develop a credential plan for each credential pursued within a credentialing occupational pathway. Soldiers will develop a separate credential plan for each MOS related and academic related credential. The plan will include the education, training, work/professional experience, and examinations required for the specified credential.
- c. CA is authorized for the payment of expenses for classroom, hands-on, or online/blended training and courses, materials, manuals, study guides, text books, processing fees, test fees, and other expenses related to the attainment or recertification of credentials.

- d. Soldiers may only use CA to fund courses and/or exams required within their approved credential occupational pathway. Soldiers must complete the requested credential plan before requesting a new credential plan.
- e. For the Civilian Occupation Related Option, Soldiers must complete the selected credential plan in their approved credentialing occupational pathway before starting a second credential plan in their current credentialing occupational pathway.
- 7. Additional CA authorizations and restrictions. The following are in addition to the baseline TA eligibility requirements, authorizations, and restrictions identified in reference 1b:
- a. CA is subject to the same funding ceiling as TA. A Soldier may use both TA and CA; however, the combined usage by any Soldier shall not exceed the fiscal year TA limit.
- b. Soldiers must obtain a TA-eligible GAE account and request CA for credentialing courses and exams through GAE.
- c. Prior to being approved for CA, Soldiers are encouraged to meet with an Army Education Counselor, either virtually or in person, for information regarding CA program policies and procedures.
- d. Soldiers may only use CA for off-duty credentialing programs. Soldiers who request to attend credentialing courses during the duty day for more than a week without taking leave must provide a memorandum for record (MFR) signed by the first Commander in the Soldier's chain of command exercising Uniform Code of Miltiary Justice authority, approving the Soldier's full-time attendance. Assumption of command orders, if applicable, must be attached to the MFR. In the MFR, the Commander must verify that the course start date, end date, and meeting times are fully supported by the unit.
- e. When requesting CA, the Soldier must sign an electronic Statement of Understanding acknowledging compliance with Army CA policies and procedures.
- f. Soldiers may not use CA to repeat successfully completed preparatory portions of a credential, other than for those areas required for renewal of the credential.
- g. Soldiers with dual civilian and military status cannot use CA and Army Civilian Training, Education, and Development Systems funds concurrently for the same course.

h. Soldiers will not personally reimburse a training provider/vendor for approved CA funds to avoid recoupment or military service obligation.

i. Credential Plan timelines:

- (1) Soldiers must submit separate GAE Credential Plan for each credentialing course and/or exam required for their credential plan at least 30 business days prior to the course or exam start date. The 30 business days begin when the Education Center or Office submits the request to the Army Credentialing and Continuing Education Services for Soldiers (ACCESS), Army University (ArmyU).
- (2) Credential Plan submitted less than 30 business days prior to the course or exam start date will not be approved and will be returned to the Soldier.
- (3) If the training provider/vendor cancels a CA-approved course or exam, the Soldier must open a new GAE helpdesk case, attach the cancellation notice, and request CA for an appropriate replacement course or exam (if desired) not later than five business days from the date the Soldier was notified by the training provider/vendor of the cancellation.
- j. Soldiers wishing to change a Credentail Plan or withdraw from a CA course/exam for any reason must open a new GAE helpdesk case and request the change. Under no circumstances will the Soldier coordinate a change directly with the training provider/vendor. If this occurs, the Soldier will be liable for any debt incurred for the unauthorized use of CA.
- k. Soldiers are not authorized to prepay for a course/exam using personal funds while a Credential Plan is pending. Soldiers will not be reimbursed for out-of-pocket expenses.
- I. Soldiers must resolve any GAE-imposed account holds prior to requesting CA. Holds imposed due to incorrect information reported to GAE by third party systems (e.g., an educational institution or Army personnel records) must be corrected in those systems and reported correctly to GAE before such hold(s) can be lifted.
- m. Soldiers must successfully complete the credentialing course and/or exam they request to continue the use of CA. Failing/dropping a course or exam with Army cost will result in CA funds being recouped. Soldiers may request CA again once they have reimbursed the Army the entire amount of CA debt. Soldiers must provide proof from Defense Finance and Accounting System that the CA debt has been paid in full.

Soldiers may use TA (for TA eligible courses) once the CA recoupment process has been initiated.

- n. Soldiers may only request one credentialing occupational pathway change (e.g., change from the management credentialing occupational pathway to the healthcare support credentialing occupational pathway). Pathway changes will only be approved if a Soldier has not utilized CA for more than two credential plans in the current credentialing occupational pathway.
- o. Soldiers must attach a certificate, grade report, transcript or official memorandum from the training provider verifying successful completion of the credentialing course or exam to the credentialing helpdesk case within 10 business days of completion.

p. CA is not authorized for:

- (1) Preparatory classes for college/graduate admissions testing such as the Scholastic Assessment Test, Graduate Record Examination, or Law School Aptitude Test.
 - (2) Career Skills Programs.
- (3) Professional credentials, to include renewals, that are a prerequisite for appointment in the Armed Forces.
- (4) Credentials associated with doctoral level degrees as defined by the U.S. Department of Education. Examples include, but are not limited to, Doctor of Jurisprudence or Juris Doctor (J.D.), Doctor of Medicine (M.D.), Doctor of Pharmacy (Pharm.D.), and Doctor of Philosophy (Ph.D.).

q. Recoupment Waiver:

- (1) The Director, ACCESS, ArmyU, may grant a recoupment waiver when a Soldier withdraws, fails, or cannot complete a course/exam for reasons clearly beyond the individual's control, such as emergency leave/reassignment, illness/hospitalization, unanticipated military mission, or interruption of the Soldier's education due to natural or manmade disaster.
- (2) The first commander in the Soldier's chain of command exercising Uniform Code of Military Justice authority must endorse recoupment waiver requests.

- 8. Military Service Obligation.
- a. Commissioned Officers (CW2, 2LT, and above) may use CA only if the officer agrees to serve a military service obligation, in accordance with current TA requirements. Upon request and approval of CA for credentialing classes and/or materials, RA, AGR, and mobilized commissioned officers (under Title 10 or Title 32 authority), incur an Additional Duty Sevice Obligation (ADSO) of two years. Reserve Component officers (USAR/ARNG) incur an Reserve Duty Service Obligation (RDSO) of four years. The CA military service obligation commences on the ending date of each class for which CA was approved.
- b. Officers using CA for testing or recertification of a credential will not incur a service obligation. Testing or recertification funding cap for officers in their last year of service is \$2,000, provided they have not completed a second credential pathway.
- 9. Implementation of the Army-Wide CA Program. The CA program will begin with initial operating capability at selected installations/states on 1 October 2019 and will be made available to all installations/states on 1 January 2020. Expansion dates and eligible locations are listed below:
 - a. 1 October 2019
- (1) IMCOM Garrisons: Ft. Hood, Ft. Campbell, Joint Base Lewis-McChord, Ft. Carson, Ft. Drum, Ft. Riley
 - (2) Guard/USAR: TX, KY, WA, CO, NY, KS
 - b. 1 November 2019
- (1) IMCOM Garrisons: Ft. Stewart, Ft. Gordon, Ft. Bliss, Ft. Bragg, Ft. Benning, Hawaii
 - (2) Guard/USAR: GA, HI, NC
 - c. 1 December 2019
- (1) IMCOM Garrisons: Ft. Irwin, Ft. Polk, Ft. Huachuca, Ft Eustis, Ft. Lee, Ft. Jackson, Carlisle Barracks
 - (2) Guard/USAR: CA, LA, AZ, VA, SC, PA

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- d. 1 January 2020
 - (1) IMCOM Garrisons: All remaining installations, Europe and Pacific
 - (2) Guard/USAR: All remaining states, Europe and Pacific
- 10. Soldiers who participated in the CA LUT can continue to use CA under the LUT terms and conditions until 90 days after the effective date of this memorandum. All new CA participants will fall under the terms and conditions specified in paragraphs 4-8. For answers to frequently asked questions, see Enclosure 2.

11. Point of contact for this action is Dr. Pamela L. Raymer, Deputy Director, ACCESS, ArmyU, 502-613-8630, or by email at pamela.l.raymer.civ@mail.miv/

2 Encls

1. Credentialing Options and Pathways

2. Frequently Asked Questions

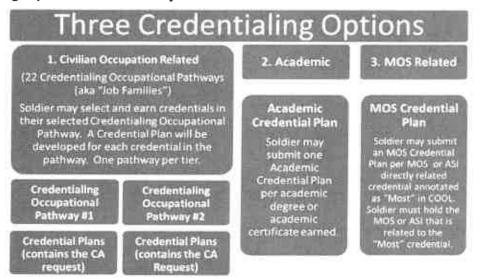
STEPHEN J. MARANIAN Brigadier General, U.S. Army

Combined Arms Center DCG-Education

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Enclosure 1:

Credentialing Options and Pathways:



Soldiers may work on all three credentialing options concurrently or sequentially.

Civilian Occupation Related Option: The Army's Credential Occupation Pathways are aligned to Department of Labor O*NET Job Families. This assists Soldiers in selecting credentials aligned to civilian career fields.

Architecture and Engineering (17-0000)

Arts, Design, Entertainment, Sports, and Media (27-0000)

Building and Grounds Cleaning and Maintenance (37-0000)

Business and Financial Operations (13-0000)

Community and Social Services (21-0000)

Computer and Mathematical (15-0000)

Construction and Extraction (47-0000)

Education, Training, and Library (25-0000)

Farming, Fishing, and Forestry (45-0000)

Food Preparation and Serving Related (35-0000)

Healthcare Practitioners and Technical (29-0000)

Healthcare Support (31-0000)

Installation, Maintenance, and Repair (49-0000)

Legal (23-0000)

Life, Physical, and Social Science (19-0000)

Management (11-0000)

Office and Administrative Support (43-0000)

Personal Care and Service (39-0000)

Production (51-0000)

Protective Services (33-0000)

Sales and Related (41-0000)

Transportation and Material Moving (53-0000)

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Enclosure 2:

Frequently Asked Questions:

- 1. A Soldier has a Tier 2 Hold on his GAE account because he has not completed the ALC. Is the Soldier eligible for CA?
- A: As long as he/she meets all other CA eligibility guidelines, the Soldier will be able to use CA to fund training courses or an exam as a part of his first credentialing occupational pathways. The Soldier must meet Tier 2 MEL eligibility before using CA to pursue a second credentialing occupational pathways.
- 2. A Soldier completed her Bachelor's degree using TA funds. Is the Soldier eligible for CA?
- A: If CA eligibility requirements are met, Soldiers are authorized to use CA regardless of current civilian education level or prior TA usage.
- 3. A Soldier submitted a completed Credential Plan on Monday. The Helpdesk case was escalated to the servicing Education Center on Tuesday. An Education Counselor reviewed the Credential Plan, verified that the Soldier met all CA eligibility requirements, and escalated the Helpdesk case to ACCESS, ArmyU on Wednesday for processing. On Thursday, a flag was placed on the Soldier's GAE account. Is the Soldier still able to get CA?
- A: The Soldier was eligible for CA at the time the plan was submitted; however, ACCESS, ArmyU will reject the plan because the Soldier became ineligible to receive CA before the plan was funded. Soldiers must be CA eligible at the time of CA funding.
- 4. A Soldier submitted a completed Credential Plan on Monday. The Helpdesk case was escalated to the Education Center on Tuesday. A flag was placed on the Soldier's account Tuesday afternoon. Is the Soldier eligible for CA?
- A: The Soldier is not eligible for CA due to the flag hold.
- 5. Soldier submitted a completed Credential Plan to the Education Center 30 business days before the start date of the training course or exam. Upon review of the plan, the Education Counselor sees that the Soldier's GAE Home School and Degree have not been set. Selecting a Home School and Degree meets the requirement to identify a credentialing pathway "Credential School." The Education Counselor adds a note to the Helpdesk case informing the Soldier of requirement to complete by way of selecting Credentialing Pathway as their Degree Program and Credential School as their Home School. After the by way of request is approved, the Education Counselor escalates the

Credential Plan to ACCESS, ArmyU. Did the Soldier meet the CA timeline requirement of submitting the request at least 30 business days before the start of a course or exam?

A: No. Valid, completed Credential Plans must be escalated to ACCESS, ArmyU at least 30 business days before the start date of a course or exam; therefore, the 30 business day timeline

begins the day that the Education Counselor escalates the case to ACCESS, ArmyU. If ACCESS, ArmyU returns the plan to the Soldier for action for any reason, the 30 business day timeline will begin when the Education Counselor escalates the corrected Credential Plan to ACCESS, ArmyU.

- 6. Soldier meets all CA eligibility requirements and submitted a Credential Plan 30+ business days before the start date of the training course/exam. Upon review, Education Counselor sees an error on the Credential Plan. Education Counselor adds a note to the Helpdesk case informing Soldier of the need to correct the specific error and attach the corrected Credential Plan to the Helpdesk case. When does the 30 business day timeline begin?
- A: The 30 business day timeline begins the date that the Education Counselor escalates the case to ACCESS, ArmyU. If ACCESS, ArmyU returns the plan to the Soldier for action for any reason, the 30 business day timeline will begin when the Education Counselor escalates the corrected Credential Plan to ACCESS, ArmyU.
- 7. Soldier visited the Education Center 30+ business days before the training course start date where he reviewed the Credential Plan and retrieved the Credential Plan documents from GAE. Soldier then submitted the Credential Plan by way of a Helpdesk case 29 business days before the start date of the course. Is the Soldier eligible for CA funding for that course?
- A: No. The 30 business day timeline begins the day the Education Counselor escalates a completed and valid Credential Plan to ACCESS, ArmyU.
- 8. Soldier submits a Credential Plan listing a course entitled "PC Technician" on the "Part 2 Admin" tab of the request and "CompTIA A+" on "Part 3 Cost" of the Credential Plan. Is this a valid Credential Plan?
- A: No. Course/exam information must be listed consistently throughout the Credential Plan. If the request is for a PC Technician course, then this course title must be listed in all tabs of the plan.
- 9. Soldier submits a Credential Plan for a training course that is TA-eligible course. Can CA still pay for it?
- A: Soldiers who wish to take a credit bearing course that supports the credential plan, must use TA funding first. Soldiers can use CA to fund a credit bearing course once they have exhausted all the TA semester hour fiscal year allocation.

If funds still remain in the Soldier's account, i.e., Soldier has not used \$4000 per FY, Soldiers must add the course to the Course Planner then enroll in the course. If the Soldier needs books, materials, etc. for the specific course, the Soldier must submit a Credential Plan listing those items. If no items are required, the Soldier must add the Credential Plan listing all credit bearing courses in their eFile.

- 10. A Soldier finds a training provider that supports the credential the Soldier wants but it isn't on the list of approved training providers, what should the Soldier do?
- A: If the Soldier finds a training provider that is not on the approved list, the Soldier can still complete the plan with the new training provider and all required information and submit. Incomplete information on the training provider will delay approval. Once the Credentail plan is submitted to ACCESS, ArmyU, the new training provider will be vetted. If approved, the new training provider will be added to the list of approved training providers.
- 11. A Soldier is not receiving notifications from GAE when notes are added to his GAE Helpdesk case.
- A: Soldiers may not be aware that GAE email notifications may be forwarded to a junk/spam mail folder. Ensure Soldiers are checking their junk/spam mail.
- 12. Soldier meets all CA eligibility requirements and submits a Helpdesk case on Monday. On Friday, Soldier clears the Education Center and his account is deactivated. Is the Soldier still able to complete the CA training course or exam?
- A: If ACCESS, ArmyU has paid for the training course or exam, the Soldier is authorized to complete it. If the training course or exam has not been funded by ACCESS, ArmyU, the Soldier is not able to complete it. The Soldier's Credential Plan helpdesk case will be automatically closed when the GAE account is deactivated cancelling the pending Credential Plan. Education Counselors should review open Helpdesk cases when Soldiers clear the Education Center. If an open Helpdesk case exists, follow the same process the ESO established for open TA Requests when a Soldier clears Education Center. Do NOT close any open CA Helpdesk cases and do NOT deactivate the account.
- 13. A Soldier is part of the Medical Evaluation Board (MEB) program. Soldier wants to enroll in a training course while awaiting the MEB decision. Is Soldier eligible for CA?
- A: Yes. A Soldier's MEB status does not disqualify her from CA usage, as long as she meets CA eligibility requirements.
- 14. A Soldier's expiration term of service date is listed as 21 August 2019 in GAE. The Soldier submits a Credential Plan for a course with an end date of 22 September 2019, with the explanation that he has submitted a release from active duty packet requesting

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a separation date of 30 September 2019. Is the Soldier eligible to use CA for this course?

- A: Possibly. The Soldier must provide separation orders that reflect a date later than the course/exam end date. The orders (with PII redacted) must be uploaded to the Soldier's eFile. If the course and exam can be completed prior to the Soldier's separation date, then the Soldier is eligible.
- 15. Is a Soldier eligible for CA if she is requesting to fund a course leading to a credential that she will not be able to complete prior to her date of separation?
- A: Yes and No. The ultimate goal for the CA program is for Soldiers to complete a credential (license / certification). If the Soldier is requesting an exam for a credential that she can attain before her separation, the Soldier can use CA funding. If the Soldier is requesting just the course that leads to the credential but cannot finish the exam and attain the credential before the separation date, she cannot receive CA funding.
- 16. A Soldier successfully completed his first credential and would like to begin a second credential; however, the Soldier has a Tier 2 hold. Is the Soldier eligible to use CA for another credential?
- A: Yes. The credentialing occupational pathway the Soldier selects contains numerous credentials. The Soldier can continue to work on all credentials within that credentialing occupational pathway in the current Tier in which the Soldier qualifies. The Tier 2 hold only applies to the TA-funded academic degrees.
- 17. If a Soldier uses TA for a credit bearing course that supports his credentialing plan, will the course grade count towards his TA grade point average (GPA)?
- A: Yes. The grade from TA-funded courses will be calculated into the TA GPA. Additionally, the semester hours used for the course will count towards the 16 semester hour FY TA limit.
- 18. How does a Soldier request funding for a credit bearing course under a credential plan once the Soldier has used all 16 semester hours of TA?
- A: The Soldier will submit a Credential Plan for the course. All required courses, including credit bearing courses, should already be listed on the Soldier's credential plan located in the Soldier's eFile.
- 19. If a Soldier has a GPA Hold, will that prevent them from using CA?
- A: No. A GPA hold will not prevent a Soldier from using CA.