

525.5 Initial FTA Eligibility Requirements

525.5.1 Special Guaranty (Retirement O/M) Cases

The employee's unmarried child age 18-19, who is a full-time student at an elementary or secondary school, as explained in [FOM-I-505.5.3](#), may be included as an IPI in the Special Guaranty Computation (also referred to as the Retirement O/M) of an employee annuity if the employee's annuity is either:

- being paid under the Special Guaranty in the month the child becomes entitled; or,
- a switch from the RR formula to the Special Guaranty formula is not prohibited.

NOTE: A spouse cannot qualify for benefits on the basis of having a full-time student in care.

525.5.2 Survivor Cases

The deceased employee's unmarried child age 18-19, who is a full-time student at an elementary or secondary school as explained in [FOM-I-505.5.3](#), can receive a survivor annuity.

NOTE: A widow(er) cannot qualify for benefits on the basis of having a full-time student in care.

525.5.3 Child Eligible Both as an FTS and as a Disabled Child

If a child appears to be eligible both as a FTS and as a disabled child, develop the case for entitlement as a disabled child. If it appears that the development of the child's claim based on disability would be prolonged, the claim may be developed for entitlement as a FTS to permit benefits to be paid while the disability claim is being developed. If the child's disability claim is established, examiners will make the necessary changes to PREH.

The advantages of a child being entitled as a disabled child rather than as a FTS are:

- A widow(er)'s current insurance annuity or a spouse's annuity may be payable if the "child in care" requirements are met;
- Follow-ups (benefit monitoring) to establish continuance of FTA are unnecessary;
- The child's annuity will not automatically be terminated at age 19; and,
- The child can be enrolled for Medicare coverage as a disabled QRRB.

525.10 Evidence Requirements

The following items are required for a student to be included in the Retirement O/M computation of the employee's annuity or to be paid direct a child's insurance annuity because of his or her status as a full-time student, age 18 -19.

525.10.1 Regular Educational Institution

Evidence	When Required
Proof of Age	Always (unless previously submitted).
Proof of Relationship	Always (unless previously submitted).
Proof of Dependency	Always (unless FTS can be deemed to be dependent or dependency was previously established).
Statement Regarding Family and Earnings for the Special Guaranty Computation (Form G-319)	Form G-319 is required if the child is 18 on the earliest date the child can be included in the Special Guaranty. Otherwise, the Form G-319 should already be in the claim file.
Student Questionnaire for Special Guaranty Computation (Form G-320)	Always if FTS age 18-19 can be included in the Special Guaranty computation of the employee's annuity. Give booklet G-316 and Form G-77a to the student.
Application for Child's Insurance Annuity (AA-19)	An application for a child's annuity (AA-19) is required to establish the child's relationship to the employee in survivor cases only if the FTS is 18-19 on the OBD. Otherwise, the application for a child's annuity should already be in the claim file.
Student Questionnaire (Form G-315)	Always in survivor student cases. Give booklet G-316 and Form G-77 to the student.
Statement by School Official (Form G-315A)	In both retirement and survivor student cases, when the student fails to return a monitoring Form G-315/G-320. This form is needed to verify the last day of full-time attendance.

School Official's Notice of Cessation of Full-Time School Attendance (Form G-315A.1).	Always in both retirement and survivor student cases. The form should be released to the student's school (or home school instructor) after FTA has been verified.
Documentation for Home Schooling Listed on Form G-315H <i>Checklist for Documentation Needed for Student Age 18-19 in Home Schooling</i>	Always in home schooling cases.

525.10.2 Approved Home-Schooling

The documentation required for home schooling is based on the laws of the state in which the student resides. Most of the documentation needed for the child should already have been assembled by the home-school teacher for approval by the school district. Request the home-school teacher to provide a copy of the required documentation for RRB records. If the field office is not able to obtain the required documentation, they will forward the case to RBD/SBD for denial or termination of student benefits

Documentation	When Required
Documentation for Home Schooling Listed on Form G-315H <i>Checklist for Documentation Needed for Student Age 18-19 in Home Schooling</i>	Always in home schooling cases.
Form G-315, " Student Questionnaire" (With Certification from Home School Instructor)	Always. Note - If the child's annuity is in pay status when the child attains age 18, an additional application for a child's annuity is not required.
A written notice to the superintendent of the school district, including: the name, age, and grade level of the student, the address at which the instruction is done, the source of instruction materials, the basic core curriculum, the proposed schedule; and, the credentials of the teacher.	Always. This is required once for each school year. If none exists, requests the home school teacher to write the letter and send it to the superintendent of the school district, with a cc: to the RRB.

Written approval of the home schooling by the superintendent of the school district in which the student resides.	Preferred. Required by most states, but not all states. This should be obtained once for each school year.
Maintenance of attendance records for the school year.	Always. These records should be updated, as available, when the student benefit is monitored.
Use of nationally recognized standardized achievement tests (including reading, mathematics, language arts, science and social studies) by the end of the school year.	Should be planned, but results may not be available at initial entitlement. These records should be updated, as available, when the student benefit is monitored.
Visits to the site of the home schooling by the Home School Evaluator.	Should be planned, but results may not be available at initial entitlement. These records should be updated when the student benefit is monitored.
A teacher with at least a high school diploma.	Required by most states, but not all states.
Instruction for the General Educational Development (GED) test for a high school equivalency diploma.	Should be planned if the student is studying at the 12 th grade level.
Form G-315a.1, "Notice of Cessation of Full-Time School Attendance."	If FTS age 18-19 can be included in O/M. This form is released to the home school instructor after the FTA is verified

525.15 Developing Initial FTA Evidence

The Family Educational Rights and Privacy Act of 1974 (Buckley Amendment) restricts release of educational records without the written consent of the students or their parents. However, Section 438(b)(1)(D) authorizes educational institutions to release records without consent when the request is in connection with a student's application for, or receipt of, financial aid. The RRB has a letter from the U. S. Department of Education, which indicates that railroad retirement benefits are considered financial aid.

If any U.S. school quotes the Family Educational Rights and Privacy Act of 1974 as the basis for refusing information, cite the above section and advise that they are authorized to furnish us with information that is necessary to determine the student's initial and continued eligibility for student benefits. Form G-315 and Form G-320 contain a

consent statement so this problem should arise infrequently. Forms G-315A and G-315A.1 include a reference to the RRB's authority for requesting information.

FTA Is defined in [FOM-I-505.5.3](#)

525.15.1 RL-175 Letter – Child Attaining Age 18

The MAP program or SURVEA program will release Form Letter RL-175 four months before a child beneficiary attains age 18. SBD and RBD do not control these cases for responses to the RL-175 letters. The letters are designed to prevent an interruption in the payment of benefits to a survivor child, or to a retirement annuitant who is being paid under the Retirement O/M. They advise that the timely filing of a required application or statement will prevent such interruption. The field office will be able to view the imaged letter using Workdesk. No action is required by the field office unless contacted by the employee, child or payee.

NOTE: Although an application can normally be filed only up to three months before eligibility, a Form G-315 or Form G-320 can be developed up to four months before eligibility when it is used to convert a minor child to a student child.

525.15.2 Development for Special Guaranty Computation Student

- A. Develop Form G-319 –When the family group includes a child age 18-19 in FTA, at the initial payment of the Special Guaranty rate, develop Form G-319 *Statement Regarding Family and Earnings for the Special Guaranty Computation* from the employee. However, if the Special Guaranty rate is already in force when the child attains age 18, and qualifies as a full-time student, any documentation of the child's relationship to the employee should already be in RRB records. Do not develop a second Form G-319 at age 18.
- B. Develop Form G-320 - Form G-320 is available on RRAILS. Always develop a Form G-320 *Student Questionnaire for Special Guaranty Computation* when the employee is claiming a child age 18-19 entitled as a student in FTA. A separate Form G-320 is required for each student and each school year. If the student changes schools in the middle of the school year, a separate Form G-320 is required for each school.

Use RRAILS Form RL-320 as cover letter whenever releasing Form G-320 to an employee. This letter advises the employee of the six steps necessary to complete and to return the Form G-320 to the field office.

If home schooling is involved, develop the documentation on Form G-315H *Checklist for Documentation Needed for Student Age 18-19 in Home Schooling* in addition to the Form G-320 (see [FOM-I-510.5.3](#)). Form G-315H is available on RRAILS.

- C. Provide Student Information - Include informational booklet G-316 *Railroad Retirement Benefits for Students Age 18-19 and in Elementary or Secondary School* only with the Form G-320 at initial entitlement as a student. Otherwise, the booklet is available at any RRB field office or on www.rrb.gov.

Always enclose Form G-77a *How Work Affects Retirement Annuities* and a return envelope. Pend the case for 30 days

525.15.3 Development for Survivor Student

- A. Develop Child's Annuity Application on APPLE - Develop a *Child's Annuity Application* on APPLE when the student is age 18-19 on the OBD. The *Child's Annuity Application* obtains the documentation of the student's relationship to the employee. However, if the child's survivor annuity is already in force when the child attains age 18 and qualifies as a full-time student, any documentation of the child's relationship to the employee is in RRB records. Do not develop a second *Child's Annuity Application* at age 18.
- B. Develop Form G-315 - Form G-315 is available on RRAILS. Always develop a Form G-315 *Student Annuitant Questionnaire* for a survivor child age 18-19 claiming FTA. A separate Form G-315 is required for each student and each school year. If the student changes schools in the middle of the school year, a separate Form G-315 is required for each school.

Use RRAILS Form RL-315 as the cover letter whenever releasing Form G-315 to a student. This letter advises the student of the five steps necessary to complete and to return the Form G-315 to the field office.

If home schooling is involved, develop the documentation on Form G-315H *Checklist for Documentation Needed for Student Age 18-19 in Home Schooling* in addition to the Form G-315 (see [FOM-I-510.5.3](#)). Form G-315H is available on RRAILS.

- C. Provide FTA Entitlement Information – Include informational booklet G-316 *Railroad Retirement Benefits for Students Age 18-19 and in Elementary or Secondary School* only with the Form G-315 at initial entitlement as a student. Otherwise, the booklet is available at any RRB field office or on www.rrb.gov.

Always include Form G-77 *How Earnings Affect Survivor Annuities* and a return envelope. Pend the case for 30 days

525.15.4 Developing FTA in Summer Months of Deemed FTA

The Form G-315 or Form G-320 school official certification should be completed by the school (or home school) the student last attended before the period of non-attendance (June monitoring).

1. If the student will resume attendance at the same school, release a second monitoring Form G-315 or Form G-320 to the school in the month the attendance is scheduled to resume (September monitoring).
2. If the student will be attending a new school after the period of non-attendance ends, release the monitoring Form G-315 or Form G-320 to the new school in the month that attendance at the new school is scheduled to begin (September monitoring).

525.15.5 Developing FTA for Student Not in Actual or Deemed FTA

If children are not in actual or deemed FTA in the month they attain age 18, they cannot be paid as students for that month. The children can be entitled effective with the first month of FTA after attaining age 18, provided all other conditions for entitlement are met (as explained in [FOM-I-530.5.2](#)).

525.15.6 Direct Deposit for Student

Survivor students do not have the option of authorizing payment of their annuity to a parent. A student is an adult beneficiary and all development in a survivor case will ordinarily be directly with the student.

If parents object to direct payment to students, explain that students are considered and treated as all other adult beneficiaries, and that representative payees will be appointed only if the students are incapable of handling their own funds.

The student may have payments credited to an account at a financial institution through direct deposit. The account can be a personal checking account or a joint account with the parent.

525.20 Student Forms Not Returned Within Thirty Days

525.20.1 Survivor Child Applicant Age 18 on OBD

If the child is age 18 on the OBD and the Form G-315 is not returned within 30 days of the date the form was released, contact the student by telephone to ascertain why it has not been returned. If the student indicates that the school is refusing to verify attendance on Form G-315, develop secondary evidence as explained in [FOM-I-525.20.4](#).

If you are unable to reach the student by telephone, release the RRAILS RL-315f letter and pend the case for an additional 15 days.

525.20.2 Child Age 18 on Special Guaranty Beginning Date

If the child is age 18 on the Special Guaranty begin date and the G-320 is not returned within 30 days, contact the employee by telephone to ascertain why it has not been returned. If the employee indicates that the school is refusing to verify attendance on Form G-320, develop secondary evidence as explained in [FOM-I-525.20.4](#).

If you are unable to reach the employee by telephone, release the RRAILS RL-320F letter and pend the case for an additional 15 days.

525.20.3 IPI Child or Survivor Annuitant Attains Age 18

If the Form G-315 or Form G-320 is requested before the IPI child or survivor child attains age 18 and the form is not returned within 30 days, contact the student or employee by telephone to ascertain why it has not been returned. If the student or employee indicates that the school is refusing to verify attendance on Form G-315 or Form G-320, develop secondary evidence as explained in [FOM-I-525.20.4](#).

If you are unable to reach the student or employee by telephone, release the RRAILS RL-315F letter or RRAILS RL-320F letter and pend the case for an additional 15 days.

525.20.4 Secondary Evidence of FTA

If students or employees allege that the educational institution refuses to complete Form G-315 or Form G-320 or charges students to complete forms, contact the school to verify the allegation (unless you already know this is the school's practice). Maintain a list of such schools in the same notebook that you use to record the names and titles of the school officials who complete RRB student forms. When a school either charges a fee or refused to verify the attendance for the student, you may, at your discretion, develop secondary evidence of FTA.

Acceptable secondary evidence of FTA in an educational institution would be anything that shows the student is carrying a sufficient number of credit hours to be in FTA and some proof of current enrollment at the school. This could include a schedule of classes accompanied by proof of payment for the current semester. The school may be able to advise the field office of what types of documentation the student should be able to produce.

Although secondary evidence is allowed for regular school attendance, there is no corresponding secondary evidence allowed for home schooling.

525.21 Student Form Not Returned Timely

525.21.1 Survivor Child Applicant Age 18 on OBD

If the student cannot be contacted and the Form G-315 is not returned by the end of the 15-day period indicated on the RL-315F, send the case for denial using manual review code 5. Complete an APPLE "Proof of Full-Time Attendance" screen (PF15) to support the SBD denial of the application. Put an "N" in the proof verified box. In "Remarks," indicate that the FTA was not verified because the child failed to return the Form G-315.

525.21.2 Child Age 18 on Special Guaranty Begin Date

If the employee cannot be contacted and the Form G-320 is not returned by the end of the 15-day period indicated on the RL-320F, abandon the development of FTA. Do not complete an APPLE "Proof of Full-Time Attendance" screen (PF15). Instead, send an Outlook message to RBD that the FTA was not verified because the employee failed to return the Form G-320. RBD will release the RRAILS RL-300 to the employee.

525.21.3 Student Form Not Returned Before the Month the Survivor Child Annuitant or IPI Child Attain Age 18

Abandon the development of FTA. Do not complete an APPLE "Proof of Full-Time Attendance" screen (PF15).

525.25 FTA Documentation Problems

525.25.1 Assure FTA Evidence Signed By Proper School Official

The field office is responsible for determining the acceptability of evidence submitted to verify school attendance at an educational institution or home schooling. When Form G-315 or Form G-320 is returned, review the contents and assure that the school certification section is signed by the proper school official.

When evidence for home schooling is received, review the contents and assure that the letter approving the home schooling is signed by the school official designated by the laws of the State in which the student resides

If you discover what may appear to be a forged form (see [FOM-I-905.20](#)), or conflicting information is secured, contact the school official in person or by telephone to see if the school official actually completed the form.

1. If students are in FTA at an EI and the school official did not complete the form, contact the students preferably by telephone and advise them that the form they submitted is not acceptable because it was not completed by the school official.

Furnish the students with a new Form G-315 or Form G-320 to verify the FTA by having the form properly signed by the school official.

2. If students are in home schooling and the superintendent of the school district did not sign the letter authorizing the home schooling, contact the student preferably by telephone and advise them that the authorization letter they submitted is not acceptable because it was not signed by the superintendent of the school district. Request a new letter properly signed by the school official.

Advise the student that the FTA documentation properly signed by the school official must be received by the RRB within 15 days to avoid denial or termination of benefits.

525.25.2 Fraud

If you encounter cases where the student has repeatedly submitted Form G-315's or Form G-320's that were forged (not completed by the school or school district), send a memorandum summarizing the occurrences and photocopies of the suspect forms to Office of Programs - Field Service.

If the student is not in FTA and the school official certification was forged (the school official did not complete the Form G-315 or Form G-320), notify the Debt Recovery Division of the apparent forgery by memorandum. Attach a photocopy of the suspect document.

525.30 FTA Evidence Does Not Verify FTA

525.30.1 Field Office Cannot Make Home Schooling Determination

If, at the field office, you cannot determine whether or not the home schooling is FTA for a survivor or Retirement O/M case, enter any FTA information that you have on the APPLE "Proof of Full-Time Attendance" screen (PF15) with an "N" in the proof verified box. Include "FTA determination has not been made." in the "Remarks" section. Enter an "A" on the APPLE Summary screen to indicate that a hard copy of the FTA proof is being sent to Headquarters. Send a copy of the home school documentation to RBD or SBD via Form G-626.

525.30.2 Student Survivor Application Denials

If the child age 18-19 files a survivor *Child's Annuity Application* and claims FTA on the OBD and the child either does not return the Form G-315 timely and properly signed by the school official or the Form G-315 submitted as proof of FTA does not verify FTA, send the application to SBD with manual review code 5 for denial. The field office is to complete the APPLE "Proof of Full-Time Attendance" screen (PF15) to support SBD's denial of the application. Put an "N" in the proof verified box. Include "FTA not verified" in the "Remarks" section of the APPLE "Proof of Full-Time Attendance" screen (PF15).

Image the original copies of any FTA documentation you were able to develop. SBD will deny the application and send a denial letter to the student. The student may reapply for benefits before attaining age 19.

525.30.3 Student Retirement O/M Denials

If the employee files Form G-319 *Statement Regarding Family And Earnings For Special Guaranty Computation* to have a child age 18-19 included in the Retirement O/M as a student and either does not return the Form G-320 timely and properly signed by the school official or the forms submitted as proof of FTA do not verify FTA, RBD does not have a pending "application" to close out. Do not enter the FTA information on the APPLE "Proof of Full-Time Attendance" screen (PF-15).

Instead, image the original FTA documentation that you were able to develop. Send an Outlook message to RBD indicating that the FTA was not verified. RBD will release RRAILS Letter RL-300 to the employee stating that the child cannot be included in the Special Guaranty. The employee may reapply for the student benefit before the child attains age 19 as long as the Special Guaranty rate is in force in the month the child becomes entitled as an FTS.

525.30.4 FTA Claimed But Not Verified for Age 18 Attainments

If the survivor or Retirement O/M child claims FTA at age 18 attainment and the child either does not return the G-315 or Form G-320 timely and signed by the proper school official or the forms submitted as proof of FTA do not verify FTA, neither SBD or RBD have a pending application to close out. Do not enter the FTA information on the APPLE "Proof of Full-Time Attendance" screen (PF15). Instead, image the original copies of the FTA documentation that you were able to develop. Send an Outlook message to SBD or RBD to indicate "FTA was not verified."

SURVEA will process the termination of the child's survivor annuity when the child attains age 18. MAP will issue a referral to RBD to adjust the Special Guaranty rate when the child attains age 18.

525.35 Initiating Student Benefits

525.35.1 Field Office Action When FTA Verified on OBD or ABD

As soon as you are satisfied with the authenticity of the school's verification of FTA, or authenticity of the verification of home schooling, enter the verified FTA proof on APPLE. On the APPLE menu, select "proof" and PF-3 "add new." Then select the APPLE (PF15) *Proof of Full-Time Attendance* screen and enter the FTA proof according to APPLE instructions in [FOM-I-1581](#). Image the original Form G-315 or Form G-320, and FTA documentation.

If home schooling documentation is used to verify FTA, the APPLE “Proof of Full-Time Attendance” screen (PF15) should indicate home schooling as the type of school. Image that documentation.

If FTA is verified by using secondary evidence (see [FOM-I- 525.20.4](#)), include "verified by secondary evidence (type)" in the “Remarks” section of the APPLE “Proof of Full-Time Attendance” screen (PF15) screen. Image the secondary evidence.

NOTE: When the student beneficiary initially becomes entitled to student benefits, the field office should contact the student in person, whenever possible; to explain the reporting responsibilities that accompany student benefits and make sure the student has received Booklet G-316 *Railroad Retirement Benefits for Students*. If the student cannot be contacted in person, the field office may contact the student by telephone. The field office should document the contact date, the contact method, and an explanation for the telephone contact, (as opposed to the preferred personal contact), on Contact Log.

525.35.2 Notification to SBD and RBD of Initial Entitlement FTA Proof

If the Child’s Annuity Application is pending on the OBD, APPLE will attempt to pay the student annuity when all proofs are present. SBD will receive a referral indicating any problems in paying the annuity. The award notice will be imaged into the claim file.

Note: APPLE creates a STAR referral for SBD when the child's application is filed if the applicant will turn age 18 within three months of the OBD. Enter the FTA proof for these cases as explained in FOM-I-525.35.3 below.

If a child can be included in the Special Guaranty on the ABD, and Form G-320, and any additional FTA documentation, verifies FTA, enter the FTA proof on the APPLE *Proof of Full-Time Attendance* screen (PF15). Put a “Y” the FTA verified box. APPLE will not pay these cases. Send an Outlook message to RBD stating that the FTA proof is on APPLE. RBD will then take steps to pay based on full-time attendance.

Once this the APPLE *Proof of Full-Time Attendance* screen (PF15) proof screen has been used to pay benefits, it cannot be changed.

525.35.3 Minor Child Attains Age 18 and Qualifies as a Full-Time Student

For children who are receiving survivor annuities as minor children prior to attaining age 18, enter the Form G-315 information on APPLE “Proof of Full-Time Attendance” screen (PF15). You must also create an APPLE application type 8 conversion requests. APPLE will code in a Form G-315 for an age 18 child-to-student attainments as a student application in the KOR/STATS program and will create a STAR referral “*Child to Student Application*” for SBD examiner handling.

For children included in the Special Guaranty prior to attaining age 18, the field office should enter the Form G-320 information on APPLE “Proof of Full-Time Attendance” screen (PF15). Send an Outlook message to the RBD mailbox whenever you enter FTA information into the APPLE “Proof of Full-Time Attendance” screen (PF15).

The APPLE “Proof of Full-Time Attendance” screen (PF15) *Proof of Full-Time Attendance* screen must be viewable by RBD or SBD prior to the month the child attains age 18 to prevent interruption in payments.

- A. When SURVEA mechanically terminates payments for the survivor child at age 18, SBD will not be able to make a timely reinstatement if the FTA documentation is not entered on the APPLE “Proof of Full-Time Attendance” screen (PF15) timely. If FTA is later verified and there is continuous entitlement, SBD will reinstate the student benefit retroactive to the same date on which the child’s annuity was terminated. However, payments may be interrupted until the reinstatement is made.
- B. RBD will need to adjust the employee’s annuity rate to remove a retirement child from the O/M computation if the FTA documentation is not entered on the APPLE “Proof of Full-Time Attendance” screen (PF15) timely. If the FTA is later verified and there is continuous entitlement, RBD needs to adjust the employee annuity again to include the student in the Retirement O/M computation retroactive to the date on which the student was removed from the Retirement O/M computation. These adjustments to the employee annuity can be avoided if the student FTA documentation is entered on the APPLE “Proof of Full-Time Attendance” screen (PF15) timely.

Once the APPLE “Proof of Full-Time Attendance” screen (PF15) has been used to pay or continue student benefits, it cannot be changed.

525.35.4 Minor Child Attains Age 18 and does not Qualify as a FTS

When the information furnished by the student on Form G-315, the home school documentation, or directly from the school, indicates that such student does not qualify as an FTS, deny the student annuity. Give the reason(s) why the student does not qualify (e.g., not considered in FTA, school he is attending is not an educational institution, etc.). Release a copy of the denial letter, image a copy.

525.36 Release Form G-315A.1 To Verify Last Day of FTA

As soon as current FTA is verified for either a survivor or Retirement O/M student, always release Form G-315A.1 to the student's school or home school teacher (see [FOM-I-1720](#), Form G-315a.1).

525.36.1 Release Form G-315A.1

The RRAILS Form RL-315A.1 cover letter explains why the RRB sent the Form G-315A.1 to the school or home school teacher. It includes the definition of full-time school attendance and requests the school or home school teacher to retain the Form G-315A.1 until an event occurs that causes the student to end the full-time school attendance.

Item 8 of Form G-315A.1 allows the field office to select either school registrar or home school teacher for the label for that item before printing the form for release to the school.

525.36.2 No Tracing is Required

No tracing action is required by the field office for return of Form G-315A.1.

525.36.3 School or Home School Teacher Returns Form G-315A.1

If the school or home school teacher returns a Form G-315A.1 to the field office, review the contents and verify that the form was signed by the proper school official or home school teacher, and follow the procedure in [FOM-I-535.5](#).