

530.5 Change in FTS Status Under Special Guaranty (Retirement O/M)

530.5.1 Continuing Entitlement

When a student, who was previously included in the Special Guaranty (Retirement O/M) computation of the employee's annuity as an FTS, resumes FTA within four months, benefits are to be reinstated effective with the date on which they were previously suspended.

Example 1: A student attained age 18 in January and dropped out of high school in his junior year on May 15. The student was removed from the Special Guaranty effective June 1 because he did not intend to resume FTA. He changed his mind and resumed FTA in secondary school on September 6. Since his period of non-attendance was 4 months or less. He can be deemed to be in FTA from June 1 through August 31. His entitlement goes back to June 1.

Example 2 - A child was last in FTA in May and attained age 18 in July. He did not intend to return to FTA for his senior year. He was removed from the Special Guaranty rate at attainment of age 18 because he was not in actual or deemed FTA. His plans changed and he did return to high school for the September through June school year. Since he returned to FTA within four months of the last FTA (May), he can be included in the Special Guaranty as a student retroactive to July, if all other entitlement factors are met.

530.5.2 Re-entitlement

A student, whose inclusion as an IPI in the Special Guaranty (Retirement O/M) was terminated, may upon the filing of a new Form G-320 (or home schooling documentation) become re-entitled if the Special Guaranty rate is in effect (without the student) in the month of re-entitlement and the student:

1. Is under age 19 (actual or deemed);
2. Is a full-time student at an elementary or secondary school; and,
3. Has not married since he was last entitled, if the student was married, see [FOM-I-420.10.2](#).

Example - A child was last in FTA in March and attained age 18 in May. He intends to return to FTA in high school for the September through June school year. He is not entitled to student benefits for May, June, July and August. He can be entitled as a student beginning in September, if all other entitlement factors are met and the Special Guaranty rate (without the student) is in effect in that month.

530.5.3 Verifying FTA

A Form G-320 signed by the employee (and, if applicable, home schooling documentation) is always required with the signature of the school official of the school the child is attending or plans to attend. Release Form G-315A.1 (see [FOM-I-1720](#), Form G-315a.1) to the school after the FTA is verified.

If a period of non-attendance is four months or less, a Form G-320 or Form G-315A for the previous FTA is also required to verify the last date of FTA to establish continued entitlement. This may already be in the student case on USTAR from student monitoring.

530.5.4 Notifying RBD of Return to FTA

Enter the updated FTA data for the student on a new APPLE screen APMU925 (PF15). APPLE will not send a mechanical notification to RBD when an APPLE screen APMU925 (PF15) is completed for re-entitlement. Send an Outlook message to the RBD mailbox to view all the APPLE FTA proof screens for the student and reinstate the student in the employee Special Guaranty rate.

530.5.5 At Death of Employee

When the student is an IPI at the death of the railroad employee, the FAST S/T termination for the employee annuity will also stop the student IPI benefit.

- Employee has a Current Connection – A child’s annuity application is needed to pay the student a survivor annuity under the RRA. The field office jurisdiction for the monitoring of the survivor student benefit is explained in [FOM-I-520.5](#). Send an Outlook message to SBD to advise them that the FTA proof is already on APPLE screen APMU925 (PF15).
- Employee Does Not Have a Current Connection – SBD will transfer the case to SSA for payment of the student survivor benefits.

530.10 Change in FTS Status in Survivor Cases

530.10.1 Continuing Entitlement

When a student, who was previously paid an annuity as an FTS, resumes FTA within four months, benefits are to be reinstated effective with the date on which they were previously suspended.

Example 1: A student attained age 18 in January and dropped out of high school after his junior year on May 15. The student annuity was terminated effective June 1 because he did not intend to resume FTA. He changed his mind and resumed FTA in secondary school on September 6. Since his period of non-attendance was 4 months

or less; he can be deemed to be in FTA from June 1 through August 31. His student entitlement goes back to June 1.

Example 2: A child was last in FTA in May and attained age 18 in July. He did not intend to return to FTA for his senior year. His annuity terminated at attainment of age 18 because he was not in actual or deemed FTA. His plans changed and he did return to high school for the September through June school year. Since he returned to FTA within four months of the last FTA (May), he can be entitled as a student retroactive to July, if all other entitlement factors are met.

530.10.2 Re-entitlement

Students may become re-entitled upon the filing of a new Form G-315 (or home schooling documentation) if they:

- Are under age 19 (actual or deemed),
- Are full-time students at an elementary or secondary school, and
- Have not married since last entitled. If the student married, refer to [FOM1 420.10.2](#).

Example - A child was last in FTA in March and attained age 18 in May. He intends to return to FTA in high school for the September through June school year. He is not entitled to student benefits for May, June, July and August. He can be entitled as a student beginning in September, if all other entitlement factors are met.

530.10.3 Verifying FTA

A Form G-315 (or home schooling documentation) is always required with the signature of the school official of the school the child is attending or plans to attend. Release Form G-315A.1 (see [FOM-I-1720](#), Form G-315a.1) to the school after the FTA is verified. If a period of non-attendance is four months or less, a Form G-315 or Form G-315A is also required for the previous FTA to verify the last date of FTA to establish continued entitlement. This may already be in the student case on USTAR from student monitoring.

530.10.4 Notifying SBD of Return to FTA

Enter the verified FTA data on a new APPLE screen APMU925 (PF15). APPLE will not send a mechanical notification to SBD when an APPLE screen APMU925 (PF15) is completed for re-entitlement. Send an Outlook message to the SBD mailbox to view all the APPLE FTA proof screens for the student and reinstate the student annuity when:

- Student benefits have been suspended or terminated and
- Student meets all eligibility requirements; and
- Verification of continuous FTA or a new period of FTA is received before student attains age 19.

530.15 Monitoring Continued Entitlement

530.15.1 Purpose

It is the responsibility of the field office to make entitlement determinations for student beneficiaries. To assure benefit eligibility, the field office having jurisdiction over the student beneficiary will verify the student's attendance by releasing the FTA monitoring.

For those students not facing an annuity terminating event, e.g. age 19 attainment or graduation, field offices should monitor in September, March, and June.

The Payment Analysis and Systems Section in Policy and Systems (P&S-PAS) will run a student selection program in September, March, and June to capture the student cases for monitoring, and upload a referral to the Universal System Tracking and Reporting (USTAR) system. P&S-PAS will notify field offices when the cases are posted on USTAR. Field Office managers will access USTAR to assign the cases for monitoring.

The student cases are identified by a six-digit USTAR category code in the following format: field office number, followed by FT (Full Time), followed by a letter for the month ('S' for September, 'M' for March, and 'J' for June) of the monitoring year. For example, a student monitoring case for the Chicago field office for September will be coded as 296FTS.

Note: A tickler can be used in USTAR when a student turns 19 during the school year, as well as an annuity terminating event occurs in the school year. See [FOM1 530.15.1](#).

- Each student monitoring case on USTAR will contain the same information.
- The claim number, annuitant name, and annuity payee code will be displayed in the **Annuitant Info** section of the USTAR WORK DETAIL screen.
- The survivor student's name, address, and social security number will be displayed in the **Source Details** section of the USTAR WORK DETAIL screen, as shown in the following example:

JOHNNY DOE |844 N RUSH ST CHICAGO IL 60611 |SS: 123456789

- 'IPI Student', not actual name, will appear for the students included in the O/M, address, and social security number will be displayed in the **Source Details** section of the USTAR WORK DETAIL screen, as shown in the following example:.

IPI STUDENT |844 N RUSH ST CHICAGO IL 60611 |SS: 123456789

For those students with an annuity terminating event in the school year, field offices can monitor in September, April, and 2 months prior to the terminating event. (If April is 2 months prior to the terminating event, e.g. graduation, a single monitoring contact is acceptable.)

Nothing in this or the following section prohibits an office from verifying entitlement more often if circumstances warrant. Also, if the student attains age 19 before a scheduled monitoring date, refer to [FOM-I-535.20](#).

Verification of FTA serves two purposes:

- to validate payments made to students since the last (or initial) FTA verification was made; and,
- to establish "intent to continue" so that benefits may be paid to eligible students through a period of non-attendance during the summer months not to exceed 4 months.

530.15.2 Release FTA Monitoring Form G-315 in Survivor Cases

The field offices should use the RRAILS [RL-315](#) cover letter for survivor student monitoring cases. This letter lists the five steps needed to complete and return the monitoring [Form G-315](#) to the RRB field office.

The letters have a drop down menu to allow the RRB field office to customize the reference to the school official to print either "school registrar" or "home school teacher." Form G-315, Form G-77 *How Earnings Affect Survivor Annuities*, and a return envelope will always be enclosed with the RL-315 letter.

In a survivor case in which the student has a payee, send RRAILS [Form RL-313](#) to the student's payee at the same time you release the RL-315 to the student.

In addition to completing the Form G-315, the field office should request a student in home schooling to include the most current home schooling documentation described in [FOM-1-510.5.3](#).

NOTE 1: If the field office secured or will secure Forms G-315 or G-315a for some other reason (e.g., verification of FTA, attainment of age 19, etc.) in the month before or after a monitoring month, the field office may elect not to include the case in the current monitoring program.

NOTE 2: If the field office knows that the school will charge the student to complete the Form G-315, the field office may develop secondary evidence of full-time attendance as explained in [FOM-I-525.20.4](#) and have the student complete Section C of the G-315.

530.15.3 Release FTA Monitoring Form G-320 in Retirement O/M Cases

The field offices should use the RRAILS [RL-320](#) Cover letter for Retirement O/M student monitoring cases. This letter lists the six steps needed to complete and return the Form G-320 to the RRB field office.

The letters have drop down menu to allow the RRB field office to customize the reference to the school official to print either “school registrar” or “home school teacher.” Form G-320, Form G-77a *How Work Affects Retirement Annuities*, and a return envelope will always be enclosed with the RL-320 letter.

In addition to completing the Form G-320, the field office should request a student in home schooling to include the most current home schooling documentation described in [FOM-1-510.5.3](#).

NOTE 1: If the field office secured or will secure Forms G-315 or G-315a for some other reason (e.g., verification of FTA, attainment of age 19, etc.) in the month before or after a monitoring month, the field office may elect not to include the case in the current monitoring program.

NOTE 2: If the field office knows that the school will charge the student to complete the Form G-320, the field office may develop secondary evidence of full-time attendance as explained in [FOM-I-525.20.4](#) and have the employee complete Sections C - D of the G-320.

530.15.4 Pend For Thirty Days

Establish a 30-day call-up for return of the monitoring Form G-315 or monitoring Form G-320. If the Form G-315 is not returned within 30 days, contact the student (preferably by telephone; use the mail if you are unable to reach the student by telephone) to ascertain why it has not been returned.

If the Form G-320 is not returned within 30 days, contact the employee (preferably by telephone; use the mail if you are unable to reach the employee by telephone) to ascertain why it has not been returned.

If the school is refusing to verify attendance on Form G-315 or Form G-320, develop secondary evidence as explained in [FOM-1-525.25.4](#).

In all other cases, release the RRAILS RL-315f letter or RRAILS RL-320f letter and pend the case for an additional 15 days.

530.15.5 Monitoring Form Not Returned After 45 Days

If the monitoring Form G-315 or Form G-320 is not returned by the end of the 45 day period or you cannot contact the student, release RRAILS [Form G-315a](#) to the school registrar to determine the last date of FTA.

- A. Survivor Cases - You can suspend the student's annuity immediately on the FAST-S/T system pending return of the G-315A.

When school returns the Form G-315A indicating that the survivor student stopped FTA, the field office should terminate the student annuity. Send an Outlook message to the SBD mailbox with the last day of FTA only when the student benefit was not terminated timely (there is an overpayment) or if other survivor annuitants are entitled on the same claim number and were subject to the family maximum with the student included in the family group. SBD will make any annuity adjustments needed.

The field office should enter any corrections to the FTA information on a new APPLE "Proof of Full Time Attendance" screen as explained in [FOM-1-530.20.2](#).

If the school returns the Form G-315A indicating that the survivor student is still in FTA, the field office should advise the student that benefits will not be reinstated until the student completes Sections C-D of Form G-315. If the student subsequently returns a properly completed Form G-315, send an Outlook message to the SBD mailbox to reinstate benefits.

- B. Retirement O/M Cases - Do not suspend the employee annuity on FAST-S/T. Send an Outlook message to the RBD mailbox advising them that you released Form G-315A to develop for the last date of FTA directly from the school. They will remove the student from the employee's Retirement O/M rate.

If the school returns the Form G-315A indicating that the Retirement O/M student has stopped FTA, send an Outlook message to the RBD mailbox with of the last date of FTA. RBD will make any annuity adjustments needed.

The field office should enter any corrected FTA information on a new APPLE (PF-15) "Proof of Full Time Attendance" screen as explained in [FOM-1-530.20.2](#).

If the school returns the Form G-315A indicating that the Retirement O/M student is still in FTA, the field office should advise the employee that benefits will not be recertified until the employee completes Sections C-D of Form G-320. If the employee subsequently returns a properly completed Form G-320, send an Outlook message to the RBD mailbox to recertify benefits, as explained in [FOM-I-530.5.10](#).

530.20 Monitoring Form Returned

When the Form G-315 or Form G-320 is returned, review the contents and verify that the form was signed by the proper school official, as explained in [FOM-I- 525.25.1](#). The RL-315 and RL-320 cover letters instruct the annuitants to return the Form G-315 or Form G-320 to the RRB after the school verifies the FTA information. You may accept the forms returned directly from the school if all of the items on the forms have been satisfactorily completed by the student, or employee in Retirement O/M cases.

Use one of the codes shown below to record the monitoring results, and close out the case on USTAR. The three-digit code is next to drop down list of disposition types on USTAR.

CODE	MEANING
CCA	Age 19 Termination; student age 19
CCG	Graduated termination; student graduated
CCN	Not Eligible Termination; use for any non-entitlement termination event; e.g., marriage, non-attendance, falls short of FTA requirements, death, etc.
CCV	Continued Eligibility Verified
CFR	OIG Fraud Referral

530.20.1 Monitoring Form Indicates No Change in FTA Information

If a September or March monitoring Form G-315 simply verifies the continued FTA as claim on the APPLE screen APMU925 (PF15) already entered on APPLE, it is not necessary to add anything to APPLE. Image the Form G-315. If the case was selected in the monitoring program, close out the USTAR referral using code CCV. If the student entitlement continues, release Form G-315A.1 to the student's school or home school teacher (see [FOM-I-1720](#), Form G-315a.1).

No special action is required by RBD or SBD.

If the monitoring is at end of student entitlement, follow the instructions in [FOM-I-535](#) to close out the student case on USTAR.

530.20.2 Monitoring Updates Current FTA Information

APPLE can store updated FTA information for the same student from monitoring Form G-315's or monitoring Form G-320's as additional *Proof of Full-Time Attendance* (PF-15). This could be necessary when:

- A student changes schools (see [FOM-I-530.25](#)),
- A student stops FTA and later returns to FTA (see [FOM-I-530.5.10](#)); or,
- A student stops FTA on a date earlier or later than the date previously reported (see [FOM-I-535](#)).

On the APPLE menu, select “proof” and PF-3 “add new.” Then select PF15 and complete the new FTA proof screen according to APPLE instructions in [FOM-I-1581](#). Image the original monitoring Form G-315 or Form G-320.

If the FTA monitoring used home schooling documentation to verify continued FTA, the APPLE screen APMU925 (PF15) should indicate home schooling as the type of school. Image that documentation.

If the FTA monitoring used secondary evidence to verify continued FTA, enter "verified by secondary evidence (type)" in the Remarks section of APPLE screen APMU925 (PF15). Image the secondary evidence.

In “Remarks” of this APPLE screen, indicate that this is the most current FTA information based on monitoring (date).”

APPLE will not send a mechanical notification of the updated FTA information to SBD or RBD. Refer to [FOM-I-535.15](#) for field office handling of the suspension or termination of the student benefit.

If the case was selected in the monitoring program, close out the USTAR referral using code CCV.

530.25 Monitoring Changing Schools

Benefit monitoring is necessary each time a student changes schools. We need to verify the last date of FTA at the old school and verify that attendance at the new school is FTA. The school change may actually be graduation from secondary school, which is a terminating event (see [FOM-I-535](#)).

530.25.1 School Change Notification During Survivor Student Monitoring Activity

A review of the monitoring Form G-315 may indicate that the student is or will be attending a new school.

- A. Currently attending new school – Release Form G-315A to the previous school to verify the last date of FTA, unless no payments were made for months after the last Form G-315 was completed. If the monitoring Form G-315 verifies FTA at the new school, send a Form G-315A.1 to the new school. Continue handling as a regular monitoring procedure.
- B. Intent to change to a new elementary or secondary school - If the monitoring Form G-315 indicates that, after the end of the current term, the student plans to change to a new elementary or secondary school, pend your student file for the end of the school term. At that time, send Form G-315A to the old school to verify the last day of FTA. Set another call-up for the first day of the month in which the student is to start at the new elementary or secondary school. Release a Form G-315 to the student at that time and control for response. Release a

Form G-315A.1 to the new school after the Form G-315 is returned with certification of the FTA by the new school. Continue handling as a regular monitoring procedure.

530.25.2 School Change Notification During Retirement O/M Student Monitoring Activity

A review of the monitoring Form G-320 may indicate that the student is or will be attending a new elementary or secondary school.

A. Currently Attending New School

Release Form G-315A to the previous school to verify the last date of FTA, unless no payments were made for months after the last Form G-320 was completed. If the monitoring Form G-320 verifies FTA at the new elementary or secondary school, send a Form G-315A.1 to the new school. Continue handling as a regular monitoring procedure.

B. Intent to Change to a New School

If the monitoring Form G-320 indicates that after the end of the current term, the student plans to change to a new elementary or secondary school, pend your student file for the end of the school term. At that time, send Form G-315A to the old school to verify the last day of FTA. Set another call-up for the first day of the month in which the student is to start at the new elementary or secondary school. Release a Form G-320 to the employee at that time and control for response. Release a Form G-315A.1 to the new school after the Form G-320 is returned with certification of the FTA by the new school. Continue handling as a regular monitoring procedure.

530.25.3 Survivor Student Contacts Field Office Reporting School Change

Any time other than during regular monitoring periods that the survivor student reports a change in elementary or secondary school attended, it may be necessary to release Form G-315 or Form G-315A for old and new schools to the student.

A. School Change Effected

If the student is already attending the new school, send Form G-315A to the old school unless no payments were made for months after the last Form G-315 was completed. Give a Form G-315 to the student with a pre-addressed unfranked envelope for the new school and pend your file for 30 days. Release a Form G-315A.1 to the new school after the student returns the Form G-315 with the certification of the FTA by the new school. Continue handling as a regular monitoring procedure.

B. School Change Intended

If the student is still attending the old school and the intended change will occur after the next monitoring, no special action is required since the student will provide the same (or more current) information on the next monitoring Form G-315.

If the student is still attending the old school and the intended change to the new school will occur before the next monitoring, pend the case for the month the change will occur. At that time, handle the case as explained in A. above.

If the student is in a period of non-attendance and will begin attending the new school after the end of the period of non-attendance, release the Form G-315A to the old school to determine the last day of FTA at that school. Pend the case for release of Form G-315 to the student for the new school in the month the change will occur. Continue handling as a regular monitoring procedure.

530.25.4 Employee or Retirement O/M Student Contacts Field Office Reporting School Change

Any time other than during regular monitoring periods that the employee or Retirement O/M student reports a change in elementary or secondary school attended, it may be necessary to release Form G-320 or Form G-315A for old and new schools to the student.

A. School Change Effected

If the student is already attending the new school, send Form G-315A to the old school unless no payments were made for months after the last Form G-320 was completed. Give a Form G-320 to the employee with a pre-addressed unfranked envelope for the new school and pend your file for 30 days. Release a Form G-315A.1 to the new school after the employee returns the Form G-320 with the certification of the FTA by the new school. Continue handling as a regular monitoring procedure.

B. School Change Intended

If the student is still attending the old school and the intended change will occur after the next monitoring, no special action is required since the employee will provide the same (or more current) information on the next monitoring Form G-320.

If the student is still attending the old school and the intended change to the new elementary or secondary school will occur before the next monitoring, pend the case for the month the change will occur. At that time, handle the case as explained in A. above.

If the student is in a period of non-attendance and will begin attending the new school after the end of the period of non-attendance, release the Form G-315A to the old school to determine the last day of FTA at that school. Pend the case for release of

Form G-320 to the employee for the new elementary or secondary school in the month the change will occur. Continue handling as a regular monitoring procedure.

530.25.5 Transfer to a Foreign School

Even though the student intends to or does transfer to a foreign elementary or secondary school not affiliated with a U.S. elementary or secondary school, it is still the field office's responsibility to verify eligibility for benefits paid because of FTA in the last domestic school.

- A. Student currently in the U.S. - If the student has not yet left to attend the new school, mail the monitoring Form G-315 to the student, or monitoring Form G-320 to the employee in Retirement O/M cases, with a pre-addressed unfranked envelope so that attendance can be verified by the last domestic school. Follow regular monitoring procedure for release of other forms, call-ups and signature verification.
- B. Student currently in a foreign country - Release a Form G-315A to the last domestic school to verify the last day of FTA at that school.

After verifying FTA in the last domestic school, send an email to SBD or RBD, which will be responsible for verification of entitlement, based on elementary or secondary school attendance at foreign schools.

