

ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Program Name: Vocational Rehabilitation (VR)

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CHAPTER 10: Education/Training Services

Section 10.1: Post-secondary Education/Training

I. Policy Statement

This policy includes guidelines for providing post-secondary education and training services when these services are necessary for a client to prepare for and enter employment within the agreed upon occupation which is consistent with the individual's strengths, resources, priorities, concerns, abilities, capabilities and informed choice.

II. Authority

Authority for policies contained in this document includes the following:

- Workforce Innovation and Opportunity Act (WIOA), 29 U.S.C. § 3101 et seq.
- Title IV Amendments to the Rehabilitation Act of 1973, 29 U.S.C. § 701 et seq.
- State Vocational Rehabilitation Services Program 34 CFR §§:
 - Scope of vocational rehabilitation services for individuals with disabilities 361.48(b)(6)
 - Comparable benefits 361.53 (a) and (c-e)
 - Participation of individuals in cost of services based on financial need 361.54 (b)(1-2)
- Arizona Revised Statutes: 23-502-503
- Arizona Administrative Code, Title 6, Chapter 4:
 - General Considerations R6-4-201 (A)(1)(d)
 - Provision of VR services R6-4-206 (C)(1-7)
 - Economic and similar benefits R6-4-403 (A)(1)(a)(vi) and (b)(vi); (B)(2)(a)(ii)(1-2) and (b)(vi)

III. Applicability

A client interested in obtaining post-secondary education/training services for their agreed upon employment outcome must:

- A. Actively engage in career exploration, labor market research, informational interviewing, and assessment(s) as applicable or necessary to determine an employment goal that is achievable and consistent with the individual's strengths, resources, priorities, concerns, abilities, capabilities and informed choice.
- B. Not have any student loans in default status at any post-secondary education/training institutions, banks or government lenders and provide documentation of Debt Repayment Plan(s) as applicable.
- C. Submit a Free Application for Federal Student Aid (FAFSA) at least 60 days prior to the beginning of the academic period and annually thereafter. The client may also apply for other educational grants and scholarships.
- D. Apply for and be accepted into the post-secondary training program.
- E. Explore, apply for, and utilize any available comparable benefits to offset the cost of books, housing, meals, and transportation.
- F. Maintain eligibility for federal financial aid.
- G. Enroll in full time studies unless part-time enrollment is allowed by the educational/training institution and approved by VR due to a disability-related need.
- H. Provide the following documentation to the VR Counselor prior to the first academic period and annually thereafter where applicable:
 - 1. Completed FAFSA application, Student Aid Report and award/denial letters,
 - 2. Documentation of any other grant(s), tuition waiver amounts, and non-merit-based scholarship(s) awarded,
 - 3. Acceptance Letter from the educational/training institution (provided only once),
 - 4. Plan of Study and Degree Audit Report outlining coursework(s) required for completion of the post-secondary education/training program or degree,
 - 5. Tuition statement for required coursework or a training cost estimate prepared by the post-secondary education/training institution financial office,
 - 6. List of required books and supplemental items as indicated on coursework syllabus,
 - 7. Documentation to confirm the need for maintenance services, if applicable and only in accordance as per Section 12.2 Maintenance Services of this policy manual, and
 - 8. Official or unofficial transcripts and grade reports issued by the post-secondary education/training institution.

- I. Register with the college/university's Disability Resource Center to obtain available accommodations, if needed.
- J. Return post-secondary education/training funds to VR that were paid by VR prior to client receipt of Pell Grant award monies.
- K. Adhere to the approved Plan of Study.
- L. Maintain a minimum of a 2.0 cumulative grade point average (GPA) and meet the performance requirements established by the post-secondary education/ training institution for each academic grading period.
- M. Complete the training program within the timeframe allowed by the post-secondary education/training institution as identified on the most current and approved IPE.

IV. Standards

- A. The VR Counselor must provide ongoing vocational counseling and guidance as part of exploring educational requirements to assist the client in assessing viable employment goals.
- B. The VR Counselor must conduct assessment activities as needed to determine if the individual has the strengths, resources, abilities and capabilities to succeed in post-secondary education or training in relation to the development of the employment goal as applicable.
- C. The VR Counselor must work with the client to ensure that the client's disability related concerns are addressed with available supports and accommodations (e.g., disability resource centers at training institutions).
- D. Post-secondary education/training includes:
 - 1. Pre-college/remedial courses- up to 12 credit hours,
 - 2. Junior college training leading to an associate degree- up to 60 credit hours,
 - 3. Four-year training leading to a bachelor's degree-up to 120 credit hours and graduate training leading to a master's degree up to 60 credit hours,
 - 4. Advanced degrees may be considered consistent with the educational requirements of the vocational goal, or
 - 5. One occupational/vocational training program leading to a recognized certification or credential.
- E. Dual enrollment in college courses for high school students is acceptable when the courses are necessary for achieving the employment outcome as stated in the IPE. Refer to Appendix Glossary for Dual and Concurrent Enrollment.

- F. Post-secondary education/training programs must qualify for federal financial aid and be approved by any of the following: DES or statewide contracts, U.S. Department of Education, Eligible Training Provider List, or Arizona State Board for Private Postsecondary Education.
- G. Post-secondary education/training coursework must be necessary to obtain the degree, certification, or occupational skills upgrade as required by the selected and approved employment goal.
- H. Religious studies in support of a clergy employment goal is acceptable when:
 - 1. All educational costs are covered in full by a federal Pell Grant and no State funds will be used, and
 - 2. Labor Market Information (LMI) demonstrates strong local employment growth in this field.
- I. Any required prerequisites, remedial or repeated courses, course withdrawals, and/or course incompletes must be discussed with the client to resolve and alleviate against potential delays of training completion.
- J. Post-secondary education/training services such as tuition, and mandatory fees, used books, and course related supplies, maintenance support services, and transportation will be determined on an individual basis.
- K. VR must apply economic need criteria for books, course related supplies, general school supplies, maintenance support and transportation services.
- L. Tuition and mandatory fees are not subject to economic need.
- M. Support for public transportation to attend post-secondary education/training may be provided if the client does not have personal transportation or it is unavailable for use.
- N. Mileage payment for the use of the client's vehicle may be provided only if public transportation is not available per Section 12.1 Transportation Services of this policy manual.
- O. Comparable benefits must be explored during every period of tuition renewal and all available benefits will be utilized to pay for training costs (tuition, books, supplies, transportation, maintenance support, etc.) prior to using VR funds.
- P. A maximum of \$100 per academic year may be provided for general school supplies.
- Q. A client will be presumed eligible for a full Pell grant award in the event that the client or their parent/guardian refuses or neglects to apply for the Pell grant.
- R. VR funds must be applied towards the portion of remaining expenses after Pell grant and any other applicable comparable benefits have been applied.

- S. VR may prepay for the cost of post-secondary education/training in advance for the first academic period while the Pell Grant award is pending.
- T. VR must seek repayment of prepaid costs of post-secondary education/training when Pell Grant funds are awarded.
- U. Merit based funding is not considered a comparable benefit and may be applied to any training costs as determined by the client in instances when there are no donor stipulations on the allocation of funds.
- V. VR may pay for the least expensive option offered by the post-secondary education/training program for education/training-related services and goods.
- W. VR may approve tuition and maintenance support services for post-secondary education/training programs that are within 50 miles from the client's residence following the ranking order below:
 - 1. Public community college
 - 2. Vocational or technical school
 - 3. Public university
 - 4. Private college, vocational or technical school
 - 5. Private university
- X. Approval of programs outside the ranking order above may apply only when the preceding option:
 - 1. Is not available,
 - 2. Does not meet the client's disability related needs,
 - 3. Does not meet the requirements of the selected and approved employment goal, or
 - 4. Is more cost effective.
- Y. The ranking order above does not apply when all educational costs (i.e., tuition, books, maintenance support, and transportation) are covered in full by a federal Pell Grant and no VR funds will be used.
- Z. Policy exceptions are required for disability-related needs and/or employment goal requirements that preclude use of the public institution with the lowest cost that is within commuting distance of the client.
- AA. VR will not support housing and meals if the client is not living away from their primary residence.
- BB. In the event that there is not a post-secondary education/training program available within 50 miles of the client's residence, VR may approve tuition and maintenance support services at the nearest available option in the same order of precedence as listed in Section IV, W of this policy.

- CC. VR may pay for a shared dorm and campus meal plan as part of an approved post-secondary education training program if the client moves from their primary residence or meets a disability related need.
- DD. VR may pay for off campus housing and meal costs at no more than the amount equivalent to the cost of a shared dorm and campus meal plan as part of an approved post-secondary education training program during the academic year if the client moves from their primary residence or meets a disability related need.
- EE. VR may pay the equivalent of the tuition rate established by Arizona public college/university/vocational or trade school if the client chooses to attend an out-of-state or private training program when there is a comparable public or less expensive program available in Arizona.
- FF. VR may only pay for tuition and fees to public Arizona post-secondary education/training institutions at out-of-state rates for a client who is not yet an Arizona resident until the earliest date when the client could meet Arizona's residency requirements as set forth by the educational/training institution.
- GG. VR will not support repeated courses if the client must repeat a course due to a failing grade or withdrawal from the course(s) following the designated drop period for the training program.
- HH. Policy exceptions in support of repeated courses are required if due to disability related concerns.
- II. VR will not support post-secondary education/training for the subsequent semester if the client is placed on academic probation or fails to maintain a 2.0 cumulative GPA during the current or previous semester.
- JJ. VR will not provide support for tuition, books, housing, transportation or maintenance during the academic probation period.
- KK. VR may pay one training program leading to a certification or credential per current case.
- LL. VR may only pay for courses that have not been previously paid for using VR funds in any of the client's prior and current IPEs.
- MM. The VR Counselor must discuss any requested change in the client's Plan of Study and review its impact on the client's employment goal and potential extension(s) in academic program/training prior to any IPE amendment(s).
- NN. To obtain support for any level of education or training program prior to amending the IPE as per KK. above, documentation is necessary to show that the employment goal on the most current and approved IPE is not achievable without graduate education and/or that an advanced degree is required for employment as per IV. D. 4 of this section.

- OO. Any deviation from the policy provisions in this section must be pursued per Section 7.5 Policy Exceptions to Allowable Services of this manual.

V. Procedure

- A. Refer to A-C, G-I, M, P, and II above.
- B. Refer to Standard Work (if available).
- C. Refer to RSA Allowable Services spreadsheet.
- D. The IPE must be developed in accordance with Section 4.3 IPE Development in this manual and signed by all parties including both VR Counselor and client.
- E. The VR Counselor must determine the total cost of the educational/training program to include all applicable and approved services (e.g. tuition, books, supplies, meals, housing, and transportation). This information is obtained from the educational/training institution. Refer to Section 12.1 Transportation Services for calculating the cost of transportation.
- F. The VR Counselor must calculate the VR portion of the total cost after applying the amount of Pell Grant and other scholarships (if any) and document the calculation in the IPE.
- G. The VR Counselor must task the Purchasing Technician to:
 - 1. Create an RSA Purchase Authorization for the VR portion of each educational/training service approved in the IPE that will be submitted to the post-secondary education/training institution or training provider.
 - 2. Submit a Client Purchase Agreement for direct payment to the client under the agreed upon CPA when there are no contracted providers available to purchase books, supplies, meals, housing, and transportation from.
- H. Upon receipt of the providers' invoices, the VR Counselor must review the billing documentation for completeness, approve the provider's invoice and process for payment after confirming that the documentation is complete.
- I. Upon receipt of the client's receipts for the goods/services purchased directly by the client, the VR Counselor will review and scan the receipts in the client's ECF and ensure the client is in compliance with the terms of the CPA. Refer to Section 7.6 Client Purchase Agreement.
- J. The VR Counselor must coordinate with the client prior to each academic period to review the client's grades and all items as listed as per Section III, H, 1-8 of this policy to ensure satisfactory progress toward the completion of the certificate/degree is being made.

V. Documentation Requirements

The client's electronic case file must include the following items:

- A. IPE with Intermediate objectives detailing client and VR counselor tasks with expected dates completion and measurement of progress,
- B. Documentation of all financial aid awards and funding amounts that will be applied prior to VR funding per academic year,
- C. IPE (and all subsequent amendments) justification(s) discussing how each service category item will assist the client in meeting the IPE intermediate objectives in relation to their functional limitations as listed on their Eligibility Determination Worksheet (EDW) to achieve the employment outcome,
- D. All items listed as per Section III, H, 1-8 of this policy, and
- E. Case notes documenting regular "check ins" with the client to track progress.