

## **ARIZONA DEPARTMENT OF ECONOMIC SECURITY**

**Program Name:** Vocational Rehabilitation (VR)

**Policy Number:** VR-10.1-v5

**Effective Date:** July 1, 2008

**Last Revision:** October 25, 2024

**CHAPTER 10:** Education/Training Services

**Section 10.1:** Postsecondary Education and Training

### **I. Policy Statement**

This policy outlines the guidelines for providing postsecondary 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:
  - § 361.48 (b)(6), Scope of vocational rehabilitation services for individuals with disabilities,
  - § 361.53 (a) and (c-e), Comparable benefits, and
  - § 361.54 (b)(1-2), Participation of individuals in cost of services based on financial need.
- Arizona Revised Statutes: 23-502 and 23-503.
- Arizona Administrative Code, Title 6, Chapter 4:
  - § R6-4-201 (A)(1)(d), General considerations,
  - § R6-4-206 (C)(1-7), Provision of VR services, and
  - § R6-4-403 (A)(1)(a)(vi) and (b)(vi); (B)(2)(a)(ii)(1-2) and (b)(vi), Economic need and similar benefits.

### **III. Applicability**

This policy applies to clients who require postsecondary education or training services, to achieve their agreed-upon employment outcome as listed on their Individualized Plan for Employment (IPE).

## **IV. Standards**

### **A. General Provisions**

1. The VR Counselor must provide ongoing vocational counseling and guidance, as part of exploring the postsecondary educational requirements and to assist the client in understanding the requirements for receiving postsecondary education and training services.
2. VR may support a postsecondary education or training program when the VR Counselor has determined, through the client's participation in relevant assessments when applicable, and through career exploration activities, that the postsecondary education or training program is:
  - a) Required to achieve the agreed-upon employment outcome, and
  - b) The client has the strengths, resources, abilities, and capabilities to succeed in the postsecondary education and training program, with or without appropriate support services.
3. Postsecondary Education and Training Programs:
  - a) Postsecondary education and training includes:
    - (1) Pre-college and remedial courses of up to 12 credit hours,
    - (2) A junior college education program leading to an associate degree of up to 60 credit hours,
    - (3) A four-year educational program leading to a bachelor's degree of up to 120 credit hours,
    - (4) A graduate education program leading to a master's degree of up to 60 credit hours,
    - (5) A doctorate degree, which may be considered when consistent with the educational requirements of the employment outcome, or
    - (6) An occupational or vocational training program, leading to a recognized postsecondary credential, such as a certificate, certification, diploma, licensure, or degree.
4. VR may pay for one training program leading to a certification or credential per case.
5. To obtain VR support for an advanced postsecondary education and training program, documentation is necessary to confirm that the approved employment outcome listed in the client's IPE is not achievable without an advanced degree.

6. **Economic Need:** VR support for tuition and mandatory fees is not based on economic need. VR must apply economic need criteria for books, supplies, maintenance, and transportation services.
7. **Comparable Benefits:**
  - a) A client must make maximum efforts to explore and obtain comparable benefits 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.) before using VR funds.
  - b) Scholarships and grants that are not based on financial need are considered comparable benefits.
  - c) Monetary awards or scholarships based on merit are not considered a comparable benefit and may be applied to any postsecondary education or training costs, as determined by the client in instances when the donor does not put restrictions or conditions on the use of the money.
  - d) Federal Student Aid:
    - (1) Federal Student Aid Pell Grants are a comparable benefit.
    - (2) A client must submit a Free Application for Federal Student Aid (FAFSA) when VR supports the client with postsecondary education and training in an academic institution eligible for Federal Student Aid.
    - (3) A client participating in a postsecondary education and training program eligible for Federal Student Aid programs is presumed eligible for a full Pell Grant award if the client or their parent/guardian refuses or neglects to apply for the Pell Grant via the FAFSA application.
8. **Postsecondary Education and Training Related Services:** Postsecondary education and training services including tuition, mandatory fees, used books, supplies, maintenance, and transportation will be determined individually.
9. **Plan of Study:**
  - a) The VR counselor must obtain and review the Plan of Study before supporting a postsecondary education or training program.
  - b) VR will only support postsecondary education and training courses necessary, as outlined in the academic Plan of Study, to obtain the degree, certification, or occupational skills, as required by the selected and approved employment goal.

- c) Any required prerequisites, remedial or repeated courses, course withdrawals, or course incompletes must be discussed with the client to resolve and prevent potential delays in completing the training.
  - d) The VR Counselor must discuss any requested change in the client's Plan of Study and review its impact on the client's employment outcome and potential extension(s) in academic program/training before any IPE amendment(s).
10. **Student Accessibility and Disability Resource Centers:** The VR Counselor must work with the client to ensure the client's disability-related concerns are addressed and the client has access to available supports and accommodations. The client must register with the postsecondary academic institution's Disability Resource Center to obtain available accommodations, if applicable.
  11. **Dual Enrollment:** Dual enrollment in college courses for high school students is acceptable when the courses are necessary to achieve the employment outcome stated in the IPE. Refer to the Appendix Glossary for Dual and Concurrent Enrollment.
  12. **Full-time Enrollment:** A client is expected to enroll and attend as a full-time student. Part-time enrollment may be approved if required due to a disability-related need and approved by the postsecondary education and training institution.
  13. **Repeated Courses:** VR will not support repeated courses if the client must repeat a course due to a failing grade or withdrawal from the course(s) after the designated drop period for the training program. A policy exception is required to support repeated courses if due to disability-related concerns.
  14. **Student Loans:** A client who has a student loan debt must provide documentation of their debt repayment plan(s) to receive support from VR. VR will not provide postsecondary education and training services to a client who has a student loan in default status with any postsecondary education and training institution, bank, or government lender.
  15. **Academic Performance Requirement:** To participate in postsecondary education and training services, a client must maintain a minimum of a 2.0 cumulative grade point average (GPA) and meet the performance requirements established by the postsecondary education and training institution for each academic grading period.
  16. **Academic Probation:** VR will not provide postsecondary education and training services to a client who is placed or is on academic probation.

17. **Client Participation Requirements:** A client participating in postsecondary education and training services must:
- a) Apply for and be accepted into the postsecondary education or training program agreed upon by the client and the VR Counselor.
  - b) Follow the approved Plan of Study.
  - c) Maintain a minimum of a 2.0 cumulative grade point average (GPA) and meet the performance requirements established by the postsecondary education and training institution for each academic grading period.
  - d) Explore, apply for, and utilize any available comparable benefits to offset the cost of the required postsecondary education and training services, such as books, housing, meals, and transportation.
  - e) Submit a FAFSA application at least 60 days before the beginning of the first academic period, and annually thereafter, if applicable. The client may also apply for other educational grants and scholarships.
  - f) If awarded a Federal Pell Grant, the client must meet satisfactory academic progress, per the postsecondary education and training program institution policy, to continue to receive Federal Student Aid.
  - g) Enroll and attend a postsecondary education and training institution as a full-time student, unless part-time enrollment is approved by VR for a disability-related need and it is allowed by the institution.
  - h) Return the postsecondary education and training funds to VR that were paid by VR before the client received the Federal Pell Grant award monies.
  - i) Complete the training program within the timeframe allowed by the postsecondary education and training institution, as identified on the most current and approved IPE.
  - j) A client must provide the following documentation to the VR Counselor before the first academic period, and as required thereafter, where applicable:
    - (1) A completed FAFSA application, Pell Grant Award or denial letter, and Student Aid Report, provided to VR at the beginning of each academic year, if applicable,
    - (2) Documentation of any grant(s), tuition waiver amounts, and non-merit-based scholarship(s) awarded, provided to VR at the beginning of each academic year, if applicable,

- (3) The acceptance letter from the educational or training institution is provided only once,
  - (4) The Plan of Study and Degree Audit Report, outlining coursework(s) required for completion of the postsecondary education and training program or degree, as requested by VR,
  - (5) The tuition statement for required coursework or a training cost estimate, prepared by the postsecondary education and training institution financial office, provided before the beginning of each academic period,
  - (6) The list of required books and supplemental items for each course, as indicated on the coursework syllabus, provided to VR before the beginning of each academic period,
  - (7) Documentation to confirm the need for maintenance services, if applicable and only when consistent with Section 12.2, Maintenance Services of this policy manual, and
  - (8) Official or unofficial transcripts, or grade reports issued by the postsecondary education and training institution at the end of each academic period, or as requested by VR.
18. **Change in Majors and Credit Limitations:** Regardless of the changes in a client's employment outcome or postsecondary education and training program, the maximum number of credit hours VR will support is limited to the total credit hours required for the type of program, as listed under the Postsecondary Education and Training Programs section (IV(A)(3)(a)) of this policy.
19. A postsecondary education program in religious studies in support of a clergy employment goal is acceptable when:
- a) All educational costs are covered in full by a Federal Pell Grant and no State funds will be used, and
  - b) Labor Market Information (LMI) demonstrates strong local employment growth in this field.
20. Any deviation from the guidelines within this policy section requires a policy exception, as per Section 7.5 Policy Exceptions to Allowable Services of this policy manual.

**B. Selecting a Postsecondary Education and Training Program**

1. VR may pay for the least expensive option available for the required postsecondary education and training program.

2. Postsecondary education and training programs must be approved by any of the following:
  - a) DES or statewide contracts,
  - b) The [U.S. Department of Education](#),
  - c) The [Arizona Commission for Postsecondary Education](#),
  - d) The [Eligible Training Provider List](#), or
  - e) The Arizona State Board for Private Postsecondary Education.
3. Postsecondary Education and Training Ranking Order:
  - a) VR may approve a postsecondary education and training program that is within 50 miles of the client's residence, according to the following postsecondary education and training ranking order:
    - (1) Public community college
    - (2) Vocational or technical school
    - (3) Public university
    - (4) Private college, vocational or technical school
    - (5) Private university
  - b) A client requiring a four-year degree must complete all available classes (such as the Arizona General Education Curriculum (AGEC)) at the most cost-effective local public community college available before transferring to a university to complete the remainder of their program or be responsible for the cost difference between the most cost-effective local public community college and the more expensive program (such as a public university).
4. **Exceptions to the Postsecondary and Training Ranking Order:**
  - a) VR may approve a postsecondary education and training program option outside the postsecondary education and training ranking order in Section IV(B)(3)(a) 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.
  - b) The postsecondary education and training ranking order in Section IV(B)(3)(a) does not apply when all postsecondary education and training costs (i.e., tuition, books, maintenance, and transportation

services) are covered in full by a Federal Pell Grant and no VR funds will be used.

5. Policy exceptions are required for disability-related needs or employment outcome requirements that prevent the use of the most cost-effective public community college within commuting distance of the client.

### C. **Funding Postsecondary Education, Training, and Related Services**

1. All postsecondary education and training services must be necessary for the client to meet their agreed-upon employment outcome, as listed on their IPE.
2. VR funds may be used to cover postsecondary education and training expenses after all applicable Pell Grant funds and comparable benefits have been applied first.
3. **Tuition:**
  - a) Tuition assistance is limited to those courses required to meet the postsecondary education and training program requirements as listed in the client's approved academic Plan of Study.
  - b) **Out-of-State Tuition:**
    - (1) If a client chooses to attend an out-of-state or private postsecondary education and training program, instead of the most cost-effective option available in Arizona, VR will only cover the tuition rate set by the Arizona program, per the postsecondary education and training ranking order of this policy section.
    - (2) For a client who does not meet the tuition criteria for Arizona (in-state) residents, VR may pay the out-of-state resident rate until the earliest date when the client meets Arizona's residency requirements, as set forth by the postsecondary educational and training institution.
  - c) 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.
4. **Mandatory Fees:** VR may pay the mandatory fees required of students when registering for the postsecondary education and training program.
5. **Prepayment:** VR may prepay the cost of the postsecondary education and training in advance, for the first academic period, while the Pell Grant award is pending.
6. **Repayment:** VR must seek repayment of prepaid costs for postsecondary education and training when Pell Grant funds are awarded and received by the client.



7. **Books:** VR may pay for required books and supplemental materials as listed in the syllabus of each course. Clients are expected to purchase used books when available.
8. **Supplies:** A maximum of \$100.00 per academic year may be provided for general school supplies.
9. **Tutoring:** A client must meet the criteria outlined in Section 10.4 Academic Tutoring of this policy manual to receive academic tutoring related to postsecondary education and training.
10. **Maintenance:** A client must meet the criteria outlined in Section 12.2 Maintenance of this policy manual to receive maintenance services related to postsecondary education and training.
  - a) If a postsecondary education and training program is not 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 the postsecondary education and training ranking order.
  - b) VR will not support housing and meals if the client is not living away from their primary residence.
  - c) **Housing:**
    - (1) **On-campus Housing:** VR may pay for a shared dorm and campus meal plan as part of an approved postsecondary education and training program if the client moves from their primary residence or meets a disability-related need.
    - (2) **Off-campus Housing:** VR may pay for off-campus housing and meal costs, up to the equivalent amount of the cost of a shared dorm and campus meal plan, as part of an approved postsecondary education and training program during the academic year, if the client moves from their primary residence or meets a disability-related need.
11. **Transportation:** A client must meet the criteria outlined in Section 12.1 Transportation of this policy manual to receive transportation services to participate in postsecondary education and training.
  - a) Support for public transportation to attend postsecondary education and training may be provided if the client does not have personal transportation or it is unavailable for use.
  - b) 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.

12. **Computers:** Computers fall under the scope of Section 12.9 Client Equipment or Section 13.1 Rehabilitation Technology of this policy manual. A client must meet the criteria outlined in Section 12.9 or Section 13.1 to receive support for a computer.

## V. Procedure

- A. Refer to Standard Work (if available).
- B. Refer to the RSA Allowable Services Document.
- C. The IPE must be developed following Section 4.3 IPE Development in this policy manual, and signed by all parties, including both the VR Counselor and the client.
- D. The VR Counselor must determine the total cost of the educational and 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 and training institution. Refer to Section 12.1 Transportation Services to calculate the cost of transportation. Refer to Section 12.2 Maintenance to calculate the cost of maintenance services.
- E. 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.
- F. The VR Counselor must task the Purchasing Specialist to:
  1. Create an RSA Purchase Authorization for the VR portion of each educational and training service approved in the IPE that will be submitted to the postsecondary education and 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.
- G. 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.
- H. Upon receipt of the client's receipts for the postsecondary education and training 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 complies with the terms of the CPA. Refer to Section 7.6 Client Purchase Agreement.
- I. The VR Counselor must coordinate with the client, before each academic period, to review the client's grades and all items as listed in the Client Participation Responsibility section of this policy, to ensure satisfactory progress toward the completion of the certificate/degree is being made.

## **V. Documentation Requirements**

- A. The client's electronic case file must include the following items:
1. IPE with Intermediate objectives detailing client and VR counselor tasks with expected dates of completion and measurement of progress for postsecondary education and training services,
  2. Documentation of all comparable benefits, including financial aid awards and funding amounts that will be applied before VR funding per academic year,
  3. FAFSA application, if applicable,
  4. Acceptance letter of the approved postsecondary education and training program,
  5. Plan of Study,
  6. Tuition statements for each academic period,
  7. List of required books and supplemental material for each academic period, if applicable,
  8. Academic grade reports issued by the postsecondary education and training program institution, at the end of each academic period, and
  9. Case notes documenting regular vocational counseling and guidance "check-ins" with the client, to track postsecondary education and training progress.