

### **3.36 - Training – Post Secondary (College/University/Vocational/Occupational)**

Training in institutions of post-secondary education can make a significant difference for individuals with disabilities in achieving employment, independence and economic self-sufficiency. Post-secondary education includes private career schools, technical institutes, hospital schools of nursing, colleges and universities.

Training is provided only after vocational assessment results in a mutual decision that the individual requires new skills or knowledge for employment, consistent with the individual's interests, abilities and capabilities.

Prior to deciding whether training is required, the counselor and the individual shall consider the following:

- The use of transferable skills to achieve suitable employment immediately;
- Job modification or assistive technology to enable the individual to return to previous employment, or retain current employment; and/or
- Physical restoration to enable a return to previous employment.

Training is not considered a required service when the individual has marketable job skills consistent with the individual's interests, abilities and capabilities.

#### **Definitions**

**Educational Expenses:** Educational expenses are costs related to post-secondary education which can be considered by DVR for funding. Determined on an individual basis consistent with DVR policy, they may include tuition and mandatory fees, books and supplies, room and board (on an exception basis only), the cost of commuting and other related expenses.

**Free Application for Federal Student Aid (FAFSA):** This is the form required by the U.S. Department of Education, Student Financial Assistance Programs for students requesting financial aid from participating institutions. Eligible individuals requesting assistance from DVR to pay for post-secondary education are required to apply for financial aid annually.

For more information about the federal Student Financial Assistance Programs and the FAFSA, visit [www.ed.gov/offices/OSFAP/Students](http://www.ed.gov/offices/OSFAP/Students).

**Student Aid Report (SAR):** This is a report sent to the student verifying information from the FAFSA and indicating eligibility for certain grants and specifying the amount (the Expected Family Contribution) the student and family are required to contribute to higher education costs, according to the Higher Education Act, as amended.

Individuals requesting financial assistance from DVR for post-secondary education are required to provide the DVR counselor with a copy of the SAR each year.

**Grants** are financial aid that does not have to be repaid. Generally, grants are for undergraduate students, and the grant amount is based on need, cost of attendance, and enrollment status. Federal Pell Grants range from approximately \$400 to \$4,000.

**Scholarships:** Scholarships are financial support for educational programs provided by sources other than DVR which does not need to be repaid. Grants and scholarships for which the individual qualifies are a comparable benefit. Scholarships based on merit, e.g., National Merit Scholarships, are not counted as a similar benefit.

DVR has the expectation that scholarships will be applied toward the cost of schooling.

**Work-Study and Loans:** Through the application for federal financial aid, students with demonstrated financial need may be offered the opportunity to work in exchange for money for college expenses. Likewise, students and their families may be offered low interest loans. While DVR does not require that individuals take out loans or work in work-study programs, students may choose to use these means to defray educational costs.

**Independent Students** are those students who are:

1. At least 24 years old by January 1 of the award year,
2. Veterans, regardless of age,
3. Wards of the court,
4. Supporting legal dependents,
5. Married, or
6. Enrolled in a master's or doctoral program.

Students may also be considered self-supporting if they are determined to be so by financial aid administrators exercising professional judgment on the basis of unusual circumstances not covered by any of the statutory criteria.

**Western Undergraduate Exchange (WUE):** The WUE program is composed of fifteen states working together to expand educational access for all residents of the participating states. Tuition for WUE students is generally each institution's regular in-state tuition plus 50% of that amount, a considerable savings over non-resident rates. For more information, go to <http://www.wiche.edu/>.

## **Procedures for Post Secondary Education**

### **Ability to benefit**

The individual's ability to benefit from post-secondary training in terms of an employment outcome shall be determined as part of the individual's vocational rehabilitation needs assessment. The agency shall not support attendance in a post-secondary program for which the individual does not meet the published entrance requirements.

### **Accredited Institutions**

Agency financial support for college, vocational business or technical training shall be limited to participation in nationally or regionally accredited, or state licensed institutions. The counselor shall have reasonable assurance that a diploma, certificate or degree received from a training program is readily accepted by employers in the field of the individual's employment goal before approving an IPE that includes such post-secondary training.

### **Private Schools**

If comparable programs exist at both public and private schools, Alaska DVR will pay the amount of the public run program.

### **Out-of-State Programs**

DVR will only pay tuition costs for programs within the state of Alaska unless DVR determines that the program is not available in Alaska. WUE schools should be utilized first when an individual is required to go out-of-state.

If the individual selects an out-of-state school when a program is available in Alaska, the individual will be responsible for the difference between the costs of attending school in Alaska and going out-of-state. In calculating the in-state cost, a PELL grant would be applied toward the in-state costs prior to determining the out-of-state costs.

DVR will not make mortgage payments nor pay rent on unoccupied houses or apartments when an individual temporarily relocates to attend a training program.

### **Training Outside of the United States**

Training at an institution outside of the United States will not be funded unless it is part of an approved course of study for an in-state institution. If the home educational institution requires out-of-country instruction as part of the individual's program, the Agency may support it at the same rate as if the program were provided at the student's home educational institution.

### **On-line Courses/Distance Learning**

Participation in an educational program consisting of on-line courses or distance learning may be considered if it meets the disability-related needs of the individual and is offered through an accredited institution of post-secondary education. Distance learning falls under the same guidelines as choosing an in-state versus out-of-state school in terms of what is the most cost effective for DVR.

### **Requirement to Apply for Financial Assistance**

DVR is a supplementary funder of post-secondary education and does not have sufficient funding to provide full scholarships to students with disabilities. According to federal VR regulations, training and related services in institutions of post-secondary education for eligible individuals under an IPE will be purchased only after the individual has completed the application process for financial aid through the institution's financial aid office and has applied for other grants and scholarships for which the individual might qualify. Application for financial assistance must be made annually.

The Agency shall not provide financial assistance for any item covered in the cost of attendance if the individual (or individual's family as applicable) fails to apply for or refuses to accept federal, state, institutional and other grants, need based scholarships, or tuition waivers for which they may be eligible.

Financial support for college or vocational training shall be consistent with the agency's policy of purchasing the service that meets the individual's vocational rehabilitation needs at least cost to DVR. This means that if a training program is available that meets the individual's vocational rehabilitation needs at a lesser cost to DVR than the program selected by the individual, DVR's support shall not exceed the less costly training program. Post-secondary education service is subject to DVR's financial participation assessment.

DVR shall not replace the expected family contribution, as determined by the post-secondary institution, using the federal Student Aid Report, in contributing toward the individual's cost of attendance at a post-secondary institution. DVR's assistance with the cost of attendance, combined with other financial resources, shall not exceed the cost of attending the least costly training institution that meets the student's vocational rehabilitation need.

All Federal and Alaska Native Corporation grants are to be applied to tuition, books and fees as a first dollar source, prior to the consideration of expenditures of DVR funds. Merit based funding may be applied to any legitimate college costs as determined by the individual.

Shared funding must be negotiated with federal, state or local partner agencies (i.e.: VA, WIA, Tribal Vocational Rehabilitation, Worker's Compensation, etc.) to carry out a joint vocational plan to provide services to individuals.

In those circumstances where the comparable benefits available through the FAFSA (Pell Grant) have yet to be determined, DVR may meet the first semester costs of post secondary education. Subsequent semester sponsorship may only be authorized upon receipt and consideration of the SAR and the award letter sent to the student by the institution. If the SAR indicates the student received a Pell Grant during the first semester, and DVR paid first semester tuition, fees and books, the first semester Pell award will be considered by the counselor as a resource to be applied in the second and subsequent semester(s). The VR counselor should make this clear to the individual.

#### **Exception to the Requirement to Apply for Financial Assistance**

Individuals are not required to complete the financial aid application process through the institution's financial aid office if:

1. The individual is only seeking admittance to an institution not participating in the federal student financial aid process; or
2. The individual is enrolling for non-degree courses, i.e., selected courses that are not part of a degree program.

#### **Tuition Waiver**

Individuals who may be eligible for a tuition waiver must still apply for financial aid through the institution.

#### **Recipients of SSI and/or SSDI**

Recipients of Supplemental Security Income (SSI) and or Social Security Disability Insurance (SSDI) are exempt from financial participation in the cost of rehabilitation services, but are required to apply for financial aid through the institution to determine eligibility for grants and scholarships.

In determining whether to allow an exception to DVR policy and include room and board as an educational expense, VR counselors will consider the availability of comparable benefits. This includes, but is not limited to SSI and or SSDI cash benefits for maintenance and living expenses of individuals determined to be dependent students according to the Higher Education Act, as amended. DVR expects that SSI or SSDI cash benefits will be utilized for

maintenance (room and board), as the purpose of SSI and/or SSDI is for daily living expenses.

Grants, regardless of the amount, have no effect on SSDI. Grant funds, which exceed tuition, fees and books, are considered unearned income for SSI recipients, and so SSI benefits may be reduced by that amount. Loans do not affect SSDI or SSI benefits. College work-study awards are considered employment, and so may affect both SSDI and SSI benefits.

### **Application Procedure for Financial Assistance**

Federal student aid is financial help for students enrolled in eligible programs at participating schools to cover school expenses, including tuition and fees, room and board, books and supplies, and transportation. A school could be a two-year or four-year public or private educational institution, a career school, or a trade school. Most federal aid is need-based.

The following procedures will be followed in applying for financial assistance from DVR for post-secondary education expenses:

1. The individual shall apply for admission to and financial assistance from the institution of post-secondary education within the time frames established by the financial aid office, and shall provide a copy of the SAR to the DVR counselor. The individual may apply for federal financial aid by completing the FAFSA on-line. Individuals are required to make application for FAFSA whether or not they believe they are eligible for funding.
2. The eligible individual/individual's family shall complete the *Financial Participation Assessment* to determine the individual/family annual contribution for services. Individuals receiving SSI and/or SSDI are excluded from a financial participation assessment.
3. If the individual's parents/family members are required to provide financial information on the FAFSA, i.e., the student is not considered independent for purposes of federal student financial aid, the parents/family members must provide financial information on the *Financial Participation Assessment* form to determine the individual/family annual contribution for post-secondary education expenses. This does not apply to individuals who receive SSI and/or SSDI.
4. The rehabilitation counselor and the individual will discuss any need for reasonable accommodations in the educational setting and will discuss the role of the disability services coordinator including the coordinator's role in referring students with disabilities for federal internships.
5. The DVR counselor will be provided the following information:
  - Enrollment status (full or part time; number of credits);
  - Cost of tuition, mandatory fees, room and board (as appropriate);
  - Grants and scholarships awarded; and
  - Tuition waiver and amount awarded to the individual.

### **Ineligibility for Financial Aid**

The agency will not authorize support for training for individuals who are ineligible to receive post secondary federal financial aid. Reasons for ineligibility for federal financial aid may include:

1. The individual owes a grant refund and has no documentation of having made satisfactory arrangements for repayment;
2. The individual has not paid federal income tax, is in arrears with the IRS and has no documentation of having made satisfactory arrangements with the IRS for repayment;
3. The individual is in default of a federal or state student loan, and has no documentation of having made good faith repayment arrangements from the lender or school, of having made a good faith effort for repayment, or of no longer being in default status;
4. The individual is convicted for the possession or sale of illegal drugs that occurred while he/she was receiving federal student aid and has not re-established eligibility as required by federal financial aid regulations (34 CFR 668.40); and/or
5. The individual has not registered for the selective service system.

Such individuals are considered to not have made a maximum effort to secure post-secondary federal or state grants or tuition waivers, and may not receive training funds from the DVR. Counselors should refer such individuals to federally funded programs which will assist them in correcting the issue, such as the Educational Opportunity Center associated with the University of Alaska Anchorage. Additional information can be obtained toll free from the Financial Aid Ombudsman office at 1-877-557-2572.

### **Student Loans**

Student loans may be encouraged as a part of the student's contribution to their own training. However, individuals may not be compelled to take student loans. DVR will not repay a defaulted loan(s). If the individual who is in default on a student loan is able to resolve the default and regains eligibility for financial aid, the policies and procedures in this Section apply.

### **Workers' Compensation Settlements**

DVR shall not replace insurance benefits received, in whole or in part, as a settlement of liability for VR services in contributing toward the cost of attendance at a post-secondary institution. This means that such targeted settlement dollars must be used before DVR dollars are used unless it can be demonstrated that such settlement dollars are no longer available.

### **Refunds**

When DVR funds are not needed by an educational institution due to subsequent replacement by college grants, need based scholarships or dropped classes, the VR counselor shall notify the institution that these funds are to be returned to DVR and not to the individual or to offset the student's loan balance. If DVR funds are reimbursed to the

individual or credited to a loan balance, an equal amount will be counted against the student's financial support from the DVR for the following semester.

### **Full Time Enrollment**

The expectation is that students will attend training on a full time basis, as defined by the institution, so that employment is achieved in a timely manner.

Exceptions for part-time attendance related to disability factors will be considered on an individual basis and require VR manager's approval (for up to two semesters/grading periods) and administrative approval (beyond two semesters/grading periods). Medical documentation related to the need for part-time attendance shall be updated at least annually.

Because most state and federal financial aid programs are based on a minimum of half time enrollment, the agency will generally not support training at a less than half-time enrollment status.

### **Duration of Training Support**

DVR financial support for post-secondary training is usually limited to one year beyond the normal period for full time matriculation identified by the institution. An extension beyond that period may be granted by the VR counselor due to an individual's disability or special circumstances, and requires an IPE amendment. DVR financial support generally shall not exceed 64 credit hours for an Associate of Arts degree, or 128 credit hours for a bachelor's degree.

### **Repeated Courses**

DVR will not provide financial assistance for courses that must be repeated due to a failing grade or withdrawal from the course(s) following the designated drop period for the post-secondary institution.

If an individual takes an incomplete, they are responsible to complete the course(s) as designated by the institution. If course(s) are not completed in a timely manner resulting in a failing grade, the individual will be responsible to cover cost to repeat the course(s).

### **Payment for Electives**

The VR counselor should be familiar with the student's curriculum or have a copy of curriculum requirements in the case record. DVR shall not pay for electives beyond those needed to complete an individual's curriculum. When there is a question as to whether a class is required to complete a curriculum that is needed to achieve the IPE outcome, the VR counselor may require written verification from the post-secondary institution.

### **Non-degree Courses**

Selected courses that are not part of degree programs may be authorized when such courses are part of an assessment to determine rehabilitation needs or identified on the IPE and necessary for the attainment of the employment goal.

### **Licensed Occupations**

The VR counselor shall discuss occupational licensing barriers, such as a criminal record, with the individual as part of IPE planning, and when possible assist the individual in

overcoming such barriers. The counselor shall not support training in a field that requires licensing unless there is reasonable assurance that licensing can be secured.

### **Graduate School**

DVR may provide financial assistance for post-baccalaureate school when the degree is the commonly recognized standard for entry into the field which is the employment goal on an approved IPE. Financial assistance for post-baccalaureate programs requires the Chief of Rehabilitation Services or the Director's approval depending upon the financial commitment of the DVR.

### **Previous Certification/Degree**

Division support for a post-secondary degree or certificate is provided only for individuals who have not already earned a degree or certificate. This does not apply:

1. To an IPE, including a bachelor's degree when the individual achieves an associate's degree as a step toward the bachelor's degree.
2. In exceptional circumstances when the disability precludes achievement of an employment outcome with current credentials, consideration may be given to DVR financial assistance for another certificate or degree. Approval from the VR manager is required in such instances.
3. When selected courses will update skills and improve employment opportunities. These courses may be provided on an individual basis with the approval of the VR counselor. Higher-level approval depends upon other approval requirements, i.e. procurement authority and duration of the courses.

### **Summer School or Inter-current Sessions**

DVR financial assistance for summer school or inter-current sessions shall be provided only when the courses to be taken:

1. Are not available during the fall or spring semesters or other standard grading period; and/or
2. Will enable the individual to graduate earlier.

The VR counselor should consider encouraging students to participate in work activities related to the employment goal during the summer and other school breaks in order to gain employment experience.

### **Trial Semester**

DVR may, at its discretion, provide financial support to an individual in one trial term or semester with at least one subject in the student's chosen major if there is doubt about the individual's ability to succeed in post-secondary training. Additional trial terms or semesters may not be supported with DVR funds. A semester or term of developmental or remedial study shall not count as a trial semester.



### **Developmental Academic or Remedial Study**

ADR may provide financial support for one semester of non-credit developmental or remedial study. DVR may not pay for developmental or remedial study if available at no cost through post-secondary institutions or other public resources. DVR support for more than one semester/grading period of developmental/remedial courses requires approval of the VR manager.

If placement testing indicates the need for more than one semester of remedial/developmental courses, this may indicate that college level coursework may be beyond the capabilities and abilities of the individual and the individual may have difficulty achieving the employment goal.

An individual who wishes to pursue post-secondary education when more than a semester of remediation is required should consider Adult Basic Education or other community education programs prior to attempting courses at the college level.

### **Books and Supplies**

Each institution of post secondary education is required to produce an annual student budget. The institution's budgeted amount for books and supplies shall be utilized as DVR's maximum contribution to the payment of this service. A direct payment to the individual or other state approved payment method is used to provide for books and supplies. A copy of the institution's budget for books and supplies is placed in the case file.

### **Vocational Training**

Occupational, vocational, or job skill training prepares students for gainful employment in a recognized occupation, not leading to an academic degree or certification. All policies regarding post-secondary training apply to vocational training. Books, uniforms and other supplies including tools will be provided based upon the program requirements of the institution.

### **Tutoring**

DVR will pay for tutoring only after the individual has exhausted no-cost tutoring services available from the post-secondary institution. Tutoring is typically provided when it is recommended by the course instructor and/or the individual is at risk of course failure.

DVR will not fund tutoring as a general academic support in order for an individual to maintain an average grade point average. The cost for the tutoring services must be reasonable and based upon the education level and expertise of the tutor. DVR will not pay a family member for tutoring services.

### **Academic Progress and Requirements for Continuation of Division Funding**

To be eligible for the continuation of funding by DVR an individual shall:

1. Maintain a minimum average grade of "C" or its equivalent on all credits completed each semester/grading period; unless otherwise negotiated to a higher standard between the VR counselor and client based on specific school and/or industry standards;

2. Maintain eligibility for financial assistance in accordance with the institution of post-secondary education's written criteria for satisfactory academic progress toward a degree or certificate;
3. Meet the requirements and responsibilities regarding the application for financial assistance.
4. Make timely progress towards meeting the goal of the IPE.
5. Follow the institution's rules for academic honesty. Expulsion from the institution for academic dishonesty will result in DVR's sponsorship being terminated for continued post secondary education.
6. Maintain attendance at the institution.
7. Maintain status as a full time student unless a medically documented disability related issue makes this impossible.

### **Resumption of Division Funding**

Individuals requesting resumption of DVR funding of post-secondary education must meet the requirements stated in the above section for a minimum of six (6) credits at their own expense before being reconsidered for financial assistance for post-secondary education by DVR.

### **VR Counselor Responsibilities**

1. Assist the individual in thoroughly exploring whether post-secondary education is required for the employment goal and, if so, in determining what major and curriculum will best prepare the individual for employment.
2. Gather information and conduct assessment activities as needed to determine if the individual has the strengths, resources, abilities and capabilities to succeed in post-secondary education.
3. Provide career counseling. Assist the individual in thoroughly exploring options.
4. Be sure that supports are in place and are included on the IPE to address disability issues and assist the individual in maintaining stability so that he/she has the best chance for academic success.
5. Advise the individual of the required procedures and responsibilities related to DVR support for post-secondary education.
6. Meet with the individual prior to each semester to:
  - review grades and the degree plan to insure the appropriate course work in being completed and progress toward the agreed upon certificate/degree is being made, i.e. be sure someone who is weak in math is not putting off taking all math courses;
  - plan coursework for the upcoming academic period:

- address any required prerequisites, remedial courses, repeated courses, withdrawals, and incompletes, and assure that the student completes related requirements so as to not delay completion of the certificate/degree;
  - discuss disability issues and facilitate provision of supports and reasonable accommodations needed and/or continuation of those which are in place;
  - emphasize the employment outcome on the IPE;
  - offer support and encourage self-advocacy; and
  - discuss funding for the next semester.
7. Clarify disability-related needs that can be anticipated in the post-secondary education setting:
    - Discuss the role of the Disability Services Coordinator at the institution of post-secondary education.
    - Anticipate needs for out-of-class accommodations.
  8. Determine DVR's financial assistance.
  9. With the student, annually review the Individualized Plan for Employment

#### **Responsibilities of the Individual**

The VR counselor shall inform individuals of the following responsibilities and shall advise them that failure to fulfill these responsibilities will result in denial or discontinuation of DVR funding:

1. Apply annually for financial assistance through the institution of post-secondary education within established time frames.
2. Provide the DVR counselor a copy of the SAR each year.
3. Provide the counselor with a letter of acceptance and proposed course of study prior to the beginning of the semester/grading period so that there is sufficient time to plan and determine whether and to what extent DVR can provide financial assistance.
4. Maintain satisfactory academic progress toward a degree or certificate program and remain in good standing with the institution of post-secondary education. Provide the VR counselor a copy of the grade report or transcript and proposed course of study upon the completion of each semester/grading period.
5. Apply any financial assistance (other than loans) received toward training and related expenses.

6. Prior to each semester/grading period, discuss the proposed course of study and its relationship to the employment goal, and progress toward the certificate/degree with the VR counselor.
7. Discuss with the VR counselor any requested change in major or course of study, considering the impact on the employment goal and any required extension in the academic program.

### **VR Manager Approval**

A VR manager's approval is required for:

1. Part-time enrollment for up to two semesters/grading periods;
2. Financial assistance for repeating a course;
3. Post-secondary degree or certificate for individuals already possessing a degree or certificate; and/or
4. Support for more than one semester/grading period of developmental/remedial courses.

### **3.37 - Transportation**

Transportation, including necessary travel and related expenses during travel, is a support service and will be provided to individuals and their attendants or escorts if necessary for the purpose of supporting and deriving the full benefit of other vocational rehabilitation services being provided.

Transportation services include bus passes, fuel assistance such as reimbursement for gasoline or repair of a vehicle. On-going transportation services will be provided in an IPE only where there is an indication there is an ability to sustain transportation after closure.

The amount and type of funding for transportation will be determined between the VR counselor and the individual considering the actual expense anticipated using the most cost-effective means of transportation consistent with the individual's needs and level of independence.

Transportation expenses related to permanent relocation will be provided only when it is identified on the IPE and required to obtain the vocational goal.

### **Personal Vehicles**

Per guidance from the Alaska Department of Law, DVR does not need to see a driver's license nor proof of insurance prior to reimbursing or paying individuals in advance for mileage. The primary concern regarding the proof of a driver's license or insurance is a negligent entrustment issue under AS 28.15.281(4) (b) – essentially, when you knowingly allow a person without a license to operate your vehicle. This statute would not apply to the agency for a number of reasons, the primary one being that the vehicle is not owned or under the control of the agency.