

Department of Human Services
Division of Rehabilitation Services
Division of Service to the Blind and Visually Impaired

PROGRAM GUIDE
DRS/DSBVI – 2017-05
Draft Date: June 8, 2018

FROM: Eric Weiss, DRS Director
Gaye Mattke, SBVI Director

TO: All DRS & DSBVI Offices

SUBJECT: Financial Participation Requirements for Secondary and Postsecondary Training Programs

This Program Guide effective on the issue date supersedes Program Guide DRS/SBVI-02-05 issued November 8, 2002. This Program Guide provides direction and policy when determining financial need for all individuals applying for services from the Division of Rehabilitation Services (DRS) or the Division of Service to the Blind and Visually Impaired (SBVI), which are referred to jointly below as Vocational Rehabilitation (VR). For purposes of determining the extent of an individual's participation in the costs of certain VR services, it is the policy of DRS and SBVI to follow the directions given in this Program Guide in conjunction with additional instructions contained in Program Guide DRS/DSBVI-2015-05 describing Financial Need policy.

Financial Participation Requirements

It is Vocational Rehabilitation policy that counselors will use a financial need test to assess the extent of a client's participation in the costs of certain services related to postsecondary training when the client requires those services in order to achieve a vocational goal. This section of the policy pertains to services available from all postsecondary training programs that require a "Federal Student Financial Assistance Program".

Counselors must determine the financial need of all applicants by completing the Financial Need Work Sheet (DHS-VR-314) and including a copy of the worksheet in the case service record. When a client requires services related to postsecondary training, maximum effort must be made to secure grant assistance or other comparable benefits that are available in whole or in part from other sources prior to using VR funds for the purchase of those services. "Maximum effort" will involve the client applying for Federal and State student financial aid assistance (such as a Pell Grant, FSEOG Grant or other grants), or for insurance benefits, workers' compensation, or other State and local benefits; however, the benefits must allow the services to be available when necessary to meet the client's objectives and the search for other comparable benefits cannot delay the provision of services to clients determined to be at extreme medical risk, based on medical evidence.

DHS annually releases a Program Guide establishing maximum allowable rates based on postsecondary costs established by public universities and vocational institutions. From these official fee schedules, the Department of Human Services (DHS) adopts the highest allowable rate and refers to this as the "Postsecondary Allowable Rate" (PSAR). VR will only pay the actual costs that are determined to be the responsibility of VR. This is subject to Federal maintenance requirements. This rate does not include disability-related expenses incurred by the client. Disability related expenses are allowed as a direct increase to the completed DHS-VR-336 and Individualized Plan for Employment (IPE). The rate set as the Postsecondary Allowable Rate applies to all public and private postsecondary academic training programs. The Vocational Rehabilitation Program will allow attendance at a private postsecondary program, but will only fund up to the rates established for South Dakota public postsecondary academic training programs.

The extent of Vocational Rehabilitation's participation in the costs of a client's training services will not be calculated until after the postsecondary training program's financial aid office's needs analysis has been received by the agency and form DVR-336 has been completed and returned to the VR Counselor. The completed DVR-336 form and the school's financial aid/balance page from the student portal should be maintained in the case file.

Federal Maintenance Requirement

As defined in §361.5(c)(34), maintenance means monetary support provided to an eligible individual for those expenses, such as food, shelter, and clothing, that are in excess of the normal expenses of the individual and that are necessitated by the individual's participation in a program of vocational rehabilitation services. The Vocational Rehabilitation Program requires adherence to this federal maintenance requirement for all services that require a financial need test. The case services record must document this test for all financial need services. In addition, Vocational Rehabilitation is not responsible for maintenance expenses if the services are available in their community/local area. If the services are available locally or closer to the client's home that will meet the individual's needs but the individual chooses the services in another or farther location, the VR client will be responsible for the additional maintenance expenses.

Scholarships

Scholarships that are based on merit cannot be considered as a comparable benefit and cannot be used to replace the financial obligations of Vocational Rehabilitation. These scholarships are easiest to determine when they are transferable to other postsecondary programs.

Scholarships that are merit based and non-transferable should include an application process, selection process based upon the individual's high achievement of their academic or leadership accomplishments, and awarded from a program other than the postsecondary program where the student is attending. Scholarships not meeting all of these requirements are considered not merit based and will be considered a comparable benefit. The dollars from a non-merit scholarship will be applied to reduce the Vocational Rehabilitation's Program's participation when the private or out of state postsecondary has been approved for the individual because of their disability and the tuition & fees are higher than the standard PSAR. Considerations for individual exceptions to the non-merit scholarship must be submitted in writing to the appropriate Assistant Director with a description of the scholarship information and justification for the consideration.

Assessment for Determining Postsecondary Readiness

It is the VR Counselor's responsibility to determine the appropriateness when funding a client's postsecondary services. The case file should support the counselor's conclusion that the individual has the ability, aptitude and interest to complete the program and obtain the degree. Evidence should include performance measures such as ACT or TABE scores.

Considering the higher-level courses required in a bachelor's degree program (300-400 level courses), if a person scores below a 21 on the ACT, a TABE could be administered to determine grade equivalencies in reading and math. If the person is not performing at a 10th grade level, remedial programs through Adult Education could be utilized to improve basic skills to ensure success prior to enrollment in postsecondary education. There are postsecondary programs that require a lower ACT composite (Black Hills State University and South Dakota State University). BHSU and SDSU only require an ACT composite score of 18. For comparison, South Dakota School of Mines requires an ACT composite of 25 and University of South Dakota requires an ACT composite of 21. An average ACT score is 21 for reference. Acceptance to a school is not always a good measure of the student's ability to succeed.

For those postsecondary programs accepting lower ACT scores and for technical schools, the Accuplacer or TABE may be a good measure if additional academic skill building would be beneficial and help the student become successful. If the client doesn't achieve an acceptable score, services will require supervisory approval. The Accuplacer is administered at no cost at all the South Dakota Technical Institutes.

"A Guide to Assessing College Readiness" (<https://aea8transition.files.wordpress.com/2013/04/guide-to-assessing-college-readiness-v5pgs1.pdf>) can be a helpful tool for the VR client and VR Counselor in determining college readiness.

Remedial Courses

Students who successfully complete remedial coursework while in high school can avoid taking remedial coursework at a postsecondary program. If a student's ACT scores are low, remedial coursework is recommended for students in English, reading and math. Remedial coursework is available on-line and most local communities. Information on remedial coursework can be found at: <http://doe.sd.gov/octe/remedial.aspx> or at a local Career Learning Center. Remedial coursework is also available at no cost or minimal costs from the Adult Education Program http://dlr.sd.gov/workforce_services/individuals/adult_education.aspx or from the Technical Institutes.

The resources available for remedial courses are a comparable benefit. If the student chooses to take remedial courses while attending a postsecondary program, these expenses will be the student's responsibility. If the student is taking remedial courses at a postsecondary program, these credit hours are not required courses as described in "Part-Time Student" description below. If the remedial courses are part of the 12 credit hours to be a full-time student, this will reduce the level of any approved maintenance expenses.

Internet Services

Individuals with low income can obtain reduced cost for their internet services through their local internet provider. The following internet link provides more information on this program at: <https://www.fcc.gov/general/lifeline-program-low-income-consumers>

VR can provide financial assistance for internet services for a student under the following conditions:

- Student provides documentation of verifying ineligibility for free internet from Lifeline;
- Student meets financial needs requirements;
- Student is taking on-line course(s); and
- Student did not previously have internet services.

Internet services will be only based on the lowest internet cost (not including cable TV). Internet services will not be funded for occasional internet access such as checking grades. The VR Counselor's supervisor will need to approve any computer purchase if the student is part-time or the need for the computer is only for a semester.

Part-Time Student

It is allowable for a VR client to be a part-time postsecondary student. However, the Vocational Rehabilitation Program should not have any increased expenses due to the additional amount of time for the student to complete the postsecondary program/training. Maintenance expenses addressed in this Program Guide will be pro-rated. Twelve credit hours (of required courses) is considered full time. If maintenance expenses such as room/board are being included in the funding and the student is only taking 9 credit hours of required courses, the approved living expenses and related expenses such as internet services will be pro-rated at 75% VR funding.

A student should be able to complete their postsecondary program within 6 years. VR clients who do not complete their postsecondary in 6 years will need VR Supervisor approval for any continued funding.

College Courses prior to Secondary Graduation (Dual Credits)

Dual credit is an opportunity for high school students who meet admissions standards to enroll in public postsecondary institutions in South Dakota and simultaneously earn credits for both their high school diploma and postsecondary degree or certificate. Some VR clients may choose to take advantage of this opportunity while still in high school. If the individual meets financial need and the courses are needed for their employment goal, VR can fund the cost for the dual credit. More information on dual credits can be found at: <http://sdmylife.com/students/advanced-education-opportunities/>.

Non-Degree Postsecondary Programs and 18-21 Secondary Programs on Postsecondary Campus

Non-degree postsecondary programs are being offered in South Dakota and surrounding states. These programs provide classes on job readiness, job seeking, independent living and some skills training courses. In addition, secondary schools are developing programs for students with disabilities who are attending classes/training on a postsecondary campus.

These secondary programs are primarily funded by the local school district. For secondary students with disabilities VR will fund the paid work experiences and any specific course that maybe related to their employment goal. Once the VR client is no-longer a student with a disability as defined in Program Guide DRS/SBVI 2017-03, the VR client must be in a degree seeking program for continued funding.

With the reauthorization of the Rehabilitation ACT in the Workforce Innovation and Opportunity Act (WIOA) the State Vocational Rehabilitation programs are required to provide Pre-Employment Transition Services (Pre-ETS) for students with disabilities who are in a secondary education program. The financial assistance from DRS/SBVI will be specifically for assisting eligible students with disabilities who are

enrolled in a secondary education program. Financial assistance for eligible individuals with disabilities who are secondary students needs to meet the following conditions:

- The secondary school is responsible for the tuition, fees, room & board expenses. VR can provide the unmet funding after the school reimbursement rate is applied and any Pell Grant assistance is applied.
- School reimbursement rate is found at: Codified Law 13-37-35.1 (http://www.sdlegislature.gov/Statutes/Codified_Laws/DisplayStatute.aspx?Type=Statute&Statute=13-37-35.1)
- Room and board expenses would need Supervisor approval.

Financial assistance for eligible individuals with disabilities who are not secondary students needs to meet the following requirements:

- The individual has a specific employment goal that requires postsecondary training (Form DHS-VR-354 Non- Degree Questionnaire can be used to help make this determination);
- The postsecondary training is for a degree/certification needed for a specific trade or occupation;
- The employment goal is approved by the VR Counselor;
- Comparable benefits such as PELL grants need to be applied towards the training expenses;
- Funding is based on state rates;
- Additional costs for room/board and travel are only funded when necessary; and
- Financial needs of the individual/family will be assessed in determining the level of VR funding.

Additional Bachelor Degree and Graduate Degree

DRS/SBVI can provide financial assistance for an additional bachelor degree or graduate degree when it is justified how their current level of education and disability prevents the individual from being employed. Approval is determined on an individual basis considering past employment, criminal background, disability, employment goal and other factors impacting the individual's employment potential. Considerations for VR funding of the post-secondary and other associated costs beyond a bachelor's degree need to be approved by the appropriate Assistant Director.

Client Financial Participation in IPE Services

The financial need policy for Vocational Rehabilitation describes the manner in which VR and the client may jointly participate in the cost of services identified in the IPE. For the purpose of postsecondary training, the Rehabilitation Counselor will calculate the balance of training costs remaining on the DVR 336 after the PSAR and all grants and other comparable benefits have been applied. This balance will be either the responsibility of the client, the joint responsibility of Vocational Rehabilitation, or the responsibility of the client and Vocational Rehabilitation. This amount is determined by the amount calculated from the "Client Financial Participation in IPE" on line 7 of Form 314. Vocational Rehabilitation can only be responsible for the additional expenses above this amount that are required due to the client's training program. Unless the federal maintenance requirement is met, the only allowable costs for postsecondary training are tuition and fees, books and supplies and additional unique expenses incurred because of the training such as travel costs to commute to the postsecondary training.

Special Considerations

It is anticipated that special considerations may occur when implementing this policy. Following are some examples of these situations. If other situations occur which are not listed below, the State Office should be contacted for assistance.

- If the client's choice would result in lower total cost to VR, the VR Counselor should discuss the situation with their supervisor to approve the situation (even if the result is paying a higher amount in other areas).
- If the only available postsecondary training program that can meet the client's particular need in assisting them to achieve an employment goal is provided at an out-of-state or private institution, Vocational Rehabilitation may financially participate, depending on whether individual circumstances require such assistance, and if financial need is documented in the case record and the plan is approved by the VR Counselor's Supervisor.
- For students attending postsecondary training part-time, Vocational Rehabilitation's participation, with all approved costs, will be pro-rated according to the number of credit hours. Federal Student Financial Assistance Program requirements continue to apply for part-time attendance.
- Students who are in default of student loan repayment cannot receive Vocational Rehabilitation financial assistance until the default is fully rectified or the lender has approved a repayment plan.
- If the client drops out of the training program, the counselor will make every effort to recapture any unused funds authorized by Vocational Rehabilitation.

Disability Related Expenses

Vocational Rehabilitation may pay for the costs of other disability-related expenses related to the postsecondary training program attendance without regard to a financial need test. Any comparable benefits must be applied first such as the VR client is a student enrolled in a secondary school and it is their responsibility for the disability services. If the VR client chooses an out-state postsecondary program as their choice when they could have attended the postsecondary training in South Dakota, VR will fund the disability related expenses at the South Dakota rates. The additional expenses of the disability related services will be the client's responsibility. Disability related expenses may include:

- Interpreter and note taking;
- Reader Services;
- Rehabilitation teaching
- Orientation and mobility services;
- Telecommunications, sensory and other technological aids and devices when they are required for the individual to attend a postsecondary training program;
- Disability related medical expenses; and
- Other disability related expenses.

Other Considerations

- When appropriate, clients may be encouraged to participate in the cost of attendance through the use of college work study or student loans, but this practice is not required. Funds available from student loans or other loans are not considered as a comparable benefit.
- Unique situations and exceptions will need approval from the appropriate Division Assistant Director.

Questions concerning this program guide should be directed to the appropriate Division Assistant Director.

Enclosures: DHS-DVR-336 Form
DHS-VR-354 Form