

Chapter 311:

Post-Secondary Education and Training

Vermont Division of Vocational Rehabilitation
Policy and Procedures Manual

Revision Date: November 2020

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Section 1: Definitions

- A) **“On-the-job training (OJT) agreement”** means DVR agrees to cover training costs associated with hiring a DVR consumer that go beyond what an employer would typically provide.
- B) **“Post-secondary training program”** means training that leads to an industry-recognized credential or marketable skills needed by local employers.
- C) **“Post-secondary education”** means academic classes at an accredited college or university leading to a degree.
- D) **“Pre-apprenticeship program”** means a program that teaches basic technical and job readiness skills in preparation to enter a Registered Apprenticeship Program.
- E) **“Progressive education and training”** means Vermont DVR’s approach to promoting post-secondary education and training by offering graduated opportunities for consumers to explore options before deciding to enroll in an academic or training program.
- F) **“Registered apprenticeship program (RAP)”** means on-the-job training programs and related classroom instruction leading to an industry-recognized credential. RAP participants are paid at least minimum wage while completing the program.
- G) **“Supported education”** means providing intensive supports for individuals with disabilities to allow them to participate in post-secondary education programs.

Section 2: General Policy

- A) There is substantial evidence that the achievement of post-secondary education and training credentials lead to higher-wage and more stable employment. Therefore, it is DVR’s policy to support all consumers in considering their options for post-secondary education and training. This includes consumers with the most significant disabilities and consumers participating in supported employment programs.
- B) Many VR consumers have had negative education and training experiences in the past and may initially be reluctant to consider these options. To address this issue, VR counselors are encouraged to use progressive education and training strategies (see Section 7) to introduce consumers to these options in a low-risk manner. Effective use of career assessment tools might also help guide a consumer to look at potential options they may never have considered.
- C) Ultimately, some consumers may decide they are only ready for entry-level employment, which is their choice. Regardless, it is an essential part of the VR counseling process to support the consumer in exploring and considering education and training opportunities leading to higher-wage employment.

- D) DVR may not place an absolute dollar limit on specific service categories or total services provided. However, DVR may set spending guidelines to ensure reasonable costs to the program. The VR counselor may make an exception to the spending guidelines with the VR regional manager's approval.
- E) When considering exceptions to the spending guidelines, the VR regional manager must consider the consumer's ability to contribute to their services. The consumer contribution must be:
 - 1) Reasonable,
 - 2) Based on financial need, and
 - 3) Not so high as to effectively deny the consumer a necessary service.
- F) DVR cannot require consumers who are SSI or SSDI beneficiaries to provide funding towards their services, including post-secondary education and training. DVR also cannot require SSI or SSDI beneficiaries to obtain student loans to fund their education or training programs. However, these consumers are still required to apply for financial aid (grants) as outlined in policy.

Section 3: Post-Secondary Training Programs

General Description

- A) Post-secondary training programs resulting in industry-recognized credentials can be a highly cost-effective strategy to help VR consumers achieve higher-wage employment. Such programs can help consumers gain marketable credentials without incurring significant educational debt. These programs can also help meet the workforce needs of employers in Vermont. They also generally do not take a long period of time to complete, which may be important for consumers who need an income. Therefore, DVR strongly supports the use of post-secondary training programs that result in industry-recognized credentials such as Licensed Nursing Assistant (LNA) or Commercial Driver's License (CDL).
- B) DVR also supports training programs that do not lead to a credential but can result in the acquisition of marketable skills. These types of programs provide the VR consumer the opportunity to develop skills that are clearly marketable to local employers.

Use of Assessment and Labor Market Information

- C) The VR counselor is encouraged to use vocational and career assessments as a guide to identify potential training opportunities that align with the consumer's interests and abilities.
- D) The VR counselor should utilize labor market information available through the Vermont Department of Labor (VDOL) to ensure the training is for employment opportunities that exist in the local area. The local business account manager (BAM) can assist the counselor and consumer with this process.

Partnering with Organizations to Fund Training Opportunities

- E) The VR counselor must assist the consumer to research and apply for available funding for training programs, including Vermont Student Assistance Corporation (VSAC) non-degree grants and VDOL funds. The blending and braiding of funding can help minimize any costs to the consumer.

Post-Secondary Training Program Spending Guidelines

- F) DVR strongly supports consumer participation in post-secondary training programs that lead to an industry-recognized credential or marketable skills through short-term and lower-cost training. VR counselors are encouraged to seek exceptions to the following spending guidelines if additional financial support is necessary for the consumer to successfully participate in these programs. All exceptions must be approved by the VR regional manager.
- 1) The spending guideline for post-secondary training programs leading to a credential is \$5,000.
 - 2) The spending guideline for post-secondary training that does not lead to an industry-recognized credential is \$1500.
 - 3) The spending guideline for costs of ancillary financial support to complete a post-secondary training program is \$2,000 per training and based on consumer need.

Guidance: – Ancillary financial support.

DVR recognizes that many consumers may require additional ancillary financial support to complete a post-secondary training program. For example, many VR consumers do not have the resources to stop working to complete a training program and may need help with general living costs. Other consumers may need funds to pay for the additional expenses associated with participating in such training. These funds are flexible and can be tailored to the support needs of the consumer. Financial support might include but is not limited to:

- Transportation costs.
- Work clothing.
- Childcare expenses.
- Maintenance costs (rent, utilities).

End Guidance.

Section 4: On-the-Job Training (OJT) Agreements

General Description

- A) An OJT agreement is only allowable in a competitive employment setting where the VR consumer is hired directly by the employer.

- B) An OJT agreement is appropriate when a VR consumer requires more than the standard level of training available through an employer to be successfully employed at a specific job. For example, if the employer must assign a co-worker to provide extra training for the VR consumer for 40 hours over a four-week period, that expense could be covered by DVR in an OJT agreement.
- C) OJT agreements must not be used as an incentive or wage subsidy for employers.

Establishing OJT Agreements with Employers

- D) If the VR counselor and the employment team determine that the VR consumer needs training beyond that which the employer typically provides, an OJT agreement is required. The agreement must be developed with the employer. The template agreement is VR-20.3 in the DVR forms set.
- E) The OJT agreement must specifically outline the required training to be provided by the employer and the cost.
- F) The BAM and/or the employment consultant will negotiate the terms of the OJT agreement, including the required skills gains the consumer must achieve. As part of the OJT agreement the employer must agree to provide documentation to verify measurable skills gains.

OJT Spending Guidelines

- G) The spending guideline for an OJT is \$3,000 per agreement or the costs necessary to allow consumers with the most significant disabilities to obtain higher-wage employment. Exceptions to this spending guideline require approval of the DVR regional manager.
- H) The amount of funds provided in the OJT agreement must be based on the actual costs that will be incurred by the employer to provide the additional training. These costs must be outlined in the OJT agreement.

Section 5: Registered Apprenticeship and Pre-Apprenticeship Programs

General Description

- A) DVR strongly encourages the use of Registered Apprenticeship Programs (RAP) and pre-apprenticeship programs to support consumers in achieving industry-recognized credentials. Individuals who complete RAPs have been shown to achieve higher wages and substantially improved job retention.
- B) RAPs can be an excellent option for VR consumers who need immediate income, because they pay at least minimum wage while the participant is in training.
- C) While RAPs have been traditionally associated with the trades (plumbing and electrical), they can be used for a wide variety of professions including healthcare, construction, and financial services.

- D) The related instruction costs for RAPs are much lower than most post-secondary education programs and therefore do not result in significant educational debt for participants.

Requirements for RAPs

- E) Registered Apprenticeships allow consumers to work and earn money while also taking related instruction classes. Incremental wage increases are established by the employer at the start of the apprenticeship.
- F) The consumer will earn a nationally recognized credential that can be used in other states. In Vermont, a variety of colleges and training programs provide the related instruction, including the Career and Technical Education Centers, Community College of Vermont (CCV), and Vermont Technical College (VTC).
- G) DVR will support consumer participation in RAPs approved by the Vermont Department of Labor.

Requirements for Pre-Apprenticeship Programs

- H) Pre-apprenticeship means a program that teaches basic technical and job readiness skills in preparation to enter a Registered Apprenticeship Program.
- I) A pre-apprenticeship program can take many forms. It can provide classroom training and hands-on experiences related to an apprenticeship occupation. It can also include a paid work experience.
- J) The best pre-apprenticeship programs are set up with close collaboration between schools and a Registered Apprenticeship sponsor. Many pre-apprenticeship programs enable students to earn credit toward the completion requirements for a Registered Apprenticeship Program.

RAP and Pre-Apprenticeship Spending Guidelines.

- K) DVR strongly supports consumer participation in pre-apprenticeship and registered apprenticeship programs that lead to higher-wage employment and has set funding guidelines for each. VR counselors are encouraged to seek exceptions to the guidelines if additional financial support is necessary for the consumer to successfully participate in these programs. All exceptions must be approved by the VR regional manager.
 - 1) The spending guideline for a youth to participate in a pre-apprenticeship program is \$2,000 per event.
 - 2) The spending guideline for consumer participation in RAPs is \$5,000.

Guidance: – Ancillary financial support.

DVR generally doesn't provide ancillary supports such as transportation, clothing, and maintenance costs for VR consumers participating in a RAP. This is because individuals participating in a RAP are paid at least minimum wage

during the apprenticeship. Exceptions to this spending guideline require approval of the VR regional manager.

End Guidance.

Section 6: Post-Secondary Education Programs

General Description

- A) Achievement of a post-secondary degree is strongly associated with higher earnings and more stable employment over one's lifespan. DVR strongly supports consumers participating in post-secondary education programs to improve their career options. It is important, however, to note the following:
- 1) DVR is not a general source of financial support for post-secondary education. DVR funding is intended to support services required to achieve an employment goal that best meets the needs and interests of the VR consumer. If an individual or their family is **just** seeking financial support for a post-secondary degree, they should be advised to seek assistance from VSAC state grants, Pell grants, and other sources of financial aid.
 - 2) Achievement of a post-secondary degree is **not** in itself an allowable goal for an Individualized Plan for Employment (IPE). Participation in a post-secondary program must be necessary to achieve a specific employment outcome.
- B) DVR may support a post-secondary education program under the following conditions:
- 1) The VR consumer needs additional vocational rehabilitation services beyond assistance with college expenses such as assistive technology and job placement assistance in addition to a post-secondary degree.
 - 2) Participation in the post-secondary education program is directly linked to the achievement of an employment outcome identified in the IPE.

Guidance: – Post-secondary education and employment goal.

- In some cases, this is very clear. For example, a consumer needs an associate degree in dental hygiene to become a dental hygienist.
- In other cases, the counselor and consumer must establish how the post-secondary program is necessary for the achievement of the employment outcome. For example, a consumer whose employment goal is marketing may need a BA degree in communications or a related field.
- The relationship between the post-secondary degree program and the typical requirements for the employment goal or field must be documented in the case record.

End Guidance.

Counseling and Guidance

- C) As noted, achievement of a post-secondary degree is associated with improved earnings and career prospects over one's life span. However, enrolling in a post-secondary degree program is often a major time and financial commitment for a VR consumer. As part of the counseling and guidance process, the VR counselor should engage the consumer in an informed decision-making process about a college program. Some considerations that might be part of this process include:
1. The acceptance, graduation, and placement rates of the program.
 2. The financial commitment involved in completing the program and the potential student debt.
 3. An understanding of the workload requirements.
 4. Family obligations and other commitments.
 5. Supports and accommodations the student may need, and the availability of and access to disability services.
 6. Differences between High School IEP (Individual Education Plan) supports and the supports a college is required to provide.
 7. The option of trying out one or more CCV classes before committing to a college degree program.
- D) In some cases, VR consumers might not be aware of non-college options to achieve highly marketable credentials. Options such as apprenticeships or short-term training programs leading to industry-recognized credentials can be much less expensive options for VR consumers to achieve their employment goals.

Expectations for Engagement in the DVR Process

- E) The VR counselor must talk with the consumer about DVR's expectations of them throughout their college experience. General expectations are:
1. Contact every month to six weeks to confirm the classes the student is taking and how they are progressing.
 - 1) Scheduled phone calls at the start and end of every semester.
 - 2) Specific IPE expectations including:
 - a) Maintenance of a 2.0 GPA or higher,
 - b) Requiring the student to send in grades at the end of each semester, and
 - c) Planning before each semester.
 - 3) Determining what involvement DVR will have in job search after graduation (out of state consumers might need to be connected to other state VR agencies).
 - 4) The VR counselor may add additional expectations based on individual circumstances.

Post-Secondary Education Spending Guidelines.

- F) DVR financial support for consumer participation at institutions of higher education can only be made in accordance with an appropriately completed IPE. DVR support is limited to education that is needed to achieve **the employment outcome** and only after

maximum efforts have been made to secure comparable services and benefits or other assistance from sources outside of DVR to pay for the higher education program.

Services, benefits, and assistance include:

- 1) Family contributions,
 - 2) Basic grant entitlements under student financial aid programs,
 - 3) Private or institution-based scholarships,
 - 4) Tuition waiver,
 - 5) Work-study, and
 - 6) Earnings.
- G) The amount of support from all resources cannot exceed the cost of the education program. It should be noted that individuals who qualify as low income are eligible for grant funding through VSAC that will cover 100% of tuition costs at Community College of Vermont. In some cases, VR consumers might not be eligible for VSAC grants based on unpaid tuition from a prior college class or a loan default, regardless of the amount. In such circumstances, DVR may consider paying these costs to allow the consumer to become eligible for grant funds. The counselor must receive regional manager approval before covering this expense.
- H) The consumer must apply to the institution's financial aid office (FAO) and cooperate in the provision of all information required by the FAO in its calculation of the consumer's eligibility for financial assistance. This application must be made sufficiently in advance of the starting date of training so that the FAO has ample time to make its determination. In no case may this application be made less than 60 days before the start of the semester. DVR may deny support of post-secondary education if the consumer fails to apply for financial aid in a timely manner or cooperate with the FAO or DVR for a determination of financial assistance to be made. The consumer is also required to give written authorization to DVR and the FAO for them to exchange information regarding the determination of eligibility for financial assistance.
- I) After the above conditions have been met, the spending guideline for unmet financial need is \$1,000 per semester for full-time matriculated students and \$500 per semester for part-time students. Exceptions to these guidelines require approval of the regional manager.
- J) DVR has primary responsibility for disability-related expenses appropriate to the successful completion of the program, such as personal care, personal assistants, or specialized tutoring, provided these services are not covered under the Americans with Disabilities Act.

Support for Out-of-State Programs

- K) DVR will support students attending out-of-state post-secondary education programs. However, the student must follow the requirements outlined in “Expectations for Engagement in the DVR Process” in this Section.

Support for Graduate Level Programs

- L) DVR will only support post-graduate programs that are required to meet the employment goal outlined in the IPE. For example, a consumer with a BA in English may need to complete a post-graduate program in education to become a teacher. Another example might be a consumer who needs a post-graduate credential to advance in their current employment.

Section 7: Progressive Education and Training

- A) As noted in Section 2) B, many VR consumers have had negative experiences with education and training programs. Others may have no family history of education or training after high school and never considered it a possibility. As a result, these consumers may be reluctant to consider these options even if they offer the potential for greater earnings. The Progressive Education approach is a Vermont DVR initiative. It is intended to promote post-secondary education and training for VR consumers by offering them graduated opportunities to explore options before they fully enroll in a program.
- B) Examples of such exploratory activities might include:
 - 1) Utilization of career-focused assessments to identify areas of potential interest.
 - 2) A tour of a college campus or training program.
 - 3) Introductory college courses such as CCV's Introduction to College and Careers.
 - 4) Dual enrollment in college courses for students in high school.
 - 5) Auditing a class or training program.
 - 6) A short-term training placement in the consumer's field of interest. For example, if a consumer is interested in nursing, a work experience in a healthcare setting would help them understand what is involved before they commit to a program.
 - 7) Enrollment in a non-matriculated class to test a consumer's interest and ability to participate in a college program.

Section 8: Supported Education Programs

- A) DVR assists consumers participating in a variety of supported post-secondary education programs including Project Search, Succeed, Think College and others. Programs such as College Steps, College Compass, and Project Search have an internship component and promise a vocational focus as part of the student's plan. State colleges and universities provide opportunities for students to gain additional education and expand their career options.

Guidance: – Supported education spending guidelines.

High School Students

- If a student who is in high school chooses to participate in College Steps, SUCCEED, Think College, or other dual enrollment opportunities, DVR may provide financial support for books, supplies, assistive

technology, transportation, or other related needs, if other funding is not available.

- DVR must not usurp any responsibilities that schools are required to provide as part of IEP and transition services.
- The student must have an open VR case and an IPE in place. The coursework must support the stated vocational or career goal of the IPE.
- DVR will not pay college tuition for a student who is still in high school.
- Exceptions to these spending guidelines require approval of the VR regional manager.

Consumers Who Have Completed High School

- In most cases participation in supported education programs is primarily funded through the Developmental Disabilities Services Division (DDSD) Medicaid Global Commitment funding. DVR will provide financial support consistent with Section 6 spending guidelines with the following exceptions:
 - ⊕ Even though supported education programs may be part-time in terms of credits and classes, DVR recognizes participation is a full-time commitment for participants. Therefore, the spending guideline is \$1,000 per semester for unmet need.
 - ⊕ For students participating in supported education programs who are not receiving DDSD Medicaid Global Commitment funds, DVR can provide funding to support their attendance.
 - ⊕ For students who are participating in supported education programs already funded by DVR through contracts with post-secondary programs (i.e., College Compass), the VR counselor may authorize additional funding for books, transportation, and other expenses consistent with Section 6 spending guidelines.
- Exceptions to these spending guidelines require approval of the VR regional manager.

End Guidance.