

<b>CSG</b> <b>Client Services</b> <b>Guide</b>	Date Issued  10/17/18	Subject  <b>College Training</b>	Section  <b>1400</b>
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### **Federal Regulations**

[34 CFR 361.48](#) - Scope of VR Services

### **State Rules**

[5 CSR 20-500](#)

## **Section 1400 COLLEGE TRAINING**

### **1400.1 Purpose**

- Training may be provided to assist clients in reaching vocational objectives within the scope of their strengths, resources, priorities, concerns, abilities, capabilities, interest and informed choice as documented in the case file.

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- Training may only be provided by colleges and universities properly accredited, recognized by the U.S. Department of Education and whose credits are transferable to other accredited colleges or universities.

### **1400.2 Initial Considerations**

- Discuss with client as appropriate:
  - Transferability of degree/certificate/course credits
  - Program requirements result in training-related employment
  - Physical features of campus
  - Disability-related support services
  - Disability-related medical needs/access to emergency care
  - Client participation in the cost of the program
  - Grants
  - Cost-effective training program comparison
- Training and related secondary services such as books, training materials, maintenance and transportation are based upon financial need.
- Vocational Rehabilitation (VR) financial application must be completed unless the client is an SSI/SSDI/TANF recipient.
- When determining the amount of assistance VR will be able to contribute toward the client's training costs
  - apply the nearest tax-supported college guideline and
  - consider available grants/gift aid.

### **1400.3 Nearest Tax-Supported College Guideline**

- The cost of education (VR maximum) for a certificate/degree is based upon the nearest Missouri tax-supported two (2) or four (4) year college appropriate for the client to reach his or her vocational objective or the actual cost of the training, whichever is less.
- For in-state private or out-of-state colleges, apply the nearest Missouri tax-supported two (2) or four (4) year college rate or the actual cost of the training, whichever is less.

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- Clients enrolled in the freshman or sophomore year of training will receive services calculated at the nearest Missouri community college rate within forty five (45) miles commuting distance or the actual cost of the training, whichever is less.
- For clients residing in areas of the state which do not have a Missouri community college within forty five (45) miles, but have a Missouri state-supported four (4) year college in their local area, the cost of education will be based on that state-supported four (4) year college rate or the actual cost of the training, whichever is less.

#### **1400.4 Exceptions to the Nearest Tax-Supported College Guideline**

- The required courses for the specific job objective are not available at the nearest Missouri tax-supported two (2) or four (4) year college.
- The nearest Missouri tax-supported two (2) or four (4) year college does not provide appropriate services for the client's disability-related needs.
- If the training is not located in-state, document whether other Missouri schools are available to train the client and provide a rationale as to why the out-of-state program was selected.
- The individual has applied to all Missouri tax-supported institutions and has only been accepted into an out-of-state specialized program within the continental United States (e.g. law school, medical school, etc.).
- Cost comparison has determined that it is more cost effective to attend the out-of-state program.
- The above exceptions must be well documented and supported in the client case file.

#### **1400.5 Training Program Cost Comparison**

- Conduct a comparison of the cost of training programs. Document/justify the expenditure of funds only if authorizing services for higher cost college training when a more cost-effective college training program is available.

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- Document cost comparison of training programs, if applicable, using the Training Program Comparison form, Cost Scenarios, or a case note.

#### **1400.6 Grants and Gift Aid ([CSG Section 600](#))**

- All clients are required to search and apply for comparable services and benefits to include application for grants and gift aid as follows:
  - Complete and submit the “Free Application for Federal Student Aid” ([FAFSA](#)).
  - Submit a copy of the Student Aid Report (SAR) to the college financial aid office and also to the counselor.  
Provide a copy of the Financial Aid Award letter prepared by the college to the counselor.
  - Make every effort to obtain a grants/gift aid award letter prior to issuance of authorization.
- Federal grants and other campus-based gift aid (grants, awards or scholarships that are transferable to other colleges/universities) must be applied toward the educational costs established by VR prior to the authorization of VR funds.
- Campus-based awards (grants, awards or scholarships that are non-transferable to other colleges/universities) may be applied to reduce the client’s educational costs or educational costs established by VR.
- When the client's eligibility for applicable grants/gift aid is unknown, document in the case file any delay in obtaining award verification. Prepare an authorization for only one semester. The practice for authorizing a single semester, when applicable grants/gift aid is unknown, may only be applied in the first year of the client’s participation in training under a VR-approved IPE. Any exceptions require supervisory review and approval.
- Indicate on the authorization, “The amount billed must be reduced by all applicable federal and state needs-based aid.”
- If the client is not eligible for grants and/or gift aid because he or she is in default on a student loan,
  - the client needs to provide the counselor with documentation regarding repayment arrangements with the postsecondary institution/loan holder

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to ensure removal of default status prior to degree (associate or bachelor) completion; and

- VR assistance with the cost of college-related expenses will not be provided if the client does not follow through with making the required minimum payments to get out of default status prior to degree completion.
  - Exceptions may be made with supervisory review and approval.
  - Document the rationale for the exception in the case file.

#### **1400.7 Normal Course Load**

- Clients must be enrolled in and satisfactorily complete courses that constitute a normal course load for a full-time student (typically a 12 hour minimum), unless circumstances approved by VR indicate the need for a reduced course load.
- If the client's disability, or unforeseen circumstances, limits the number of hours taken each semester, an exception can be made with prior approval of the counselor.
  - Exceptions may be made by a counselor II or above. All other counselors must have supervisory review and approval.
  - Document the rationale for the exception in the case file.

#### **1400.8 Courses Provided Online**

- Courses may be provided online when circumstances indicate it is the most practical way to assist the client in reaching a suitable vocational objective.
- Internet access may be provided for the duration of the required course if there are no other resources.

#### **1400.9 Grade Point Average (GPA) and Satisfactory Progress**

- Clients must acquire and maintain at least a minimum cumulative GPA of 2.0 for VR to continue participating in the cost of college training.
- Clients must provide the counselor with a copy of their grade report after each semester, quarter or trimester that documents hours taken, hours completed, grades for each course and GPA.

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- Clients and counselors should discuss progress, course changes and any accommodation-related issues of concern on a regular basis as specified in the Individualized Plan for Employment (IPE).
- Clients may be responsible for the cost of the tuition and/or required textbooks/training materials when courses have to be retaken due to poor grades, or dropping or withdrawing from a course. Any secondary services authorized may also be adjusted (e.g., transportation).
  - Exceptions may be made by a counselor II or above when the reason for withdrawing, dropping and/or failing a course is disability-related. All other counselors must have supervisory review and approval.
  - Document the rationale for the exception in the case file.

#### **1400.10 Elective Courses**

- The client is responsible for the cost of tuition, books and supplies for elective courses that are not required for the client to obtain his or her degree/certificate.
  - Exceptions may be made if the elective course is countable toward an accredited degree or certificate program and relates to the client's employment goal on his or her IPE. A counselor II or above can grant the exception; all other counselors must have supervisory review and approval. The rationale for the exception must be documented in the case file.

#### **1400.11 Remedial Courses**

- Counselors may authorize remedial courses at the college level, if recommended by the client's academic advisor, to get into courses countable toward an accredited degree or certificate program and relates to the client's employment goal on his or her IPE. Remedial coursework exceeding 12 hours requires regional manager approval prior to authorization.

#### **1400.12 Unlisted Certificate Programs at a College**

- VR may provide assistance with the cost of vocational-technical education courses or recognized certificate programs provided at a public or private college, which do not lead to an associate or higher degree.

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- The counselor must justify why the course is necessary to reach the employment goal.
- Nearest tax-supported college guidelines apply.

**1400.13 Study Abroad (Outside the Continental United States)**

- Clients should complete their course of study within the continental United States.
  - Exception: courses required for the clients to complete their degree program.
  - Tuition, books, training materials and room/board for study abroad courses will be calculated at the same rate as other required courses. Additional costs associated with studying abroad would be the responsibility of the client.

**1400.14 Licensure/Permits/Professional Registrations**

- Clients may be provided assistance with the cost of professional registrations, licensure, permits or exam fees, if required, in order for them to obtain employment in their chosen field of training.

**1400.15 Books and Training Materials**

- Required books or training materials to participate in a college training program may be purchased.

**1400.16 Room and Board**

- Room and board may be provided for clients when required to relocate more than 45 miles from their residence to successfully participate in a training program.
- Room and board may include assistance with the cost of meals and/or housing for clients living either on or off campus.
- For clients residing on campus, room and board should be authorized in accordance with fees listed for the appropriate school in the VR College Listing Fees.
- Security deposits may be provided if required for a client to participate in a VR-approved program.

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- Any deposit refunded must be returned to VR.
- VR staff will track the availability of a potential refund by using the case management system.
- Early termination penalties are the responsibility of the client. Exceptions may be granted for disability-related reasons. Such exceptions should be reviewed with the regional manager.
- For clients residing off campus or attending a school not having on-campus housing, room and board should be authorized in accordance with the “monthly allowable amount for clients not living in dorms” at the nearest state-supported college or the actual cost of housing, whichever is less.

#### **1400.17 Procedure**

- Collect required financial documentation to include financial application, if appropriate.
- Document cost comparison of training programs, if applicable, using the Training Program Comparison form, Cost Scenarios or a case note.
- Obtain documentation of grants/gift aid and/or other comparable services (SAR, Financial Aid Award letter, etc.) and determine educational-related costs.
- Complete the Financial Needs Assessment.
- Document the application of comparable services, if available, in a Cost Scenario, IPE or case note.
- Before authorizing books, training materials or tools, contact the school and/or Central Office Inventory to determine if training materials are available for transfer.
- Follow guidance related to the development and implementation of the IPE as found in [CSG Section 500](#).
- Verify the initiation of training with the client.
- In providing quality customer service, contact with the client should be regular and ongoing as agreed upon in the IPE.

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- Obtain and review grades to ensure satisfactory progress.

### **1400.18 Authorization and Billing**

- Funds for college training may be authorized in accordance with the VR College Listing Fees. For colleges/universities not listed, use the maximum allowable tuition rate. If a course is provided online at a rate differing from the typical rate at the training institution, an exception may be granted with supervisory approval.
- The amount approved for books and training materials on the VR College Listing Fees may be authorized. If books and training materials are not listed but required on the syllabus, use an estimated amount.
- Include on the authorization, “The amount billed must be reduced by all applicable federal and state needs-based aid,” as appropriate.
- An itemized list is required for billing.
- Payment cannot exceed actual costs or agency-established maximum allowable rates in accordance with cost-effective practices.
- Amendments:
  - All amendments to authorizations are completed in the case management system.
  - The district office should notify the vendor of the amendment.
  - The authorized amount may be increased or decreased but cannot exceed the maximum allowable.
- When the client is in the first year of participation in training under a VR-approved IPE and applicable grants/gift aid is unknown, document in the case file any delay in obtaining award verification. An authorization may be issued for the initial semester only. Any subsequent authorizations for semesters covered under a VR-approved IPE may only be completed once verification of grants/gift aid amounts has been received. Any exceptions require supervisory review and approval.
- When preparing an authorization for room/board maintenance, see [CSG 1800](#).
- When providing assistance with the cost of transportation, see [CSG 1800](#).

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- When preparing an authorization for training tools/equipment, [CSG 1900](#).
- When preparing an authorization for note-taking, interpreter and/or personal care attendant services, see [CSG 2000](#).
- Electronic Funds Transfer (EFT) ([CSG 700](#)) is also available to clients receiving maintenance, transportation and other types of client payments from VR. Enrolling in the EFT will allow clients to receive payments faster as it eliminates the handling and mailing of checks.