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CHAPTER 15 – TRAINING

1500 PROPRIETARY, BUSINESS, TRADE, AND TECHNICAL TRAINING

1500.1 Federal Regulations

[34 CFR 361.48](#) – Scope of Services

State Rules

[5 CSR 90-5.440](#) – Training

[5 CSR 90-5.400](#) – Comparable Services

[5 CSR 60-900.050](#) – Guidelines for Training Programs

1500.2 Best Case Practice

1500.2.1 Purpose, Definition, Approval

- Training may be provided to assist clients in reaching vocational objectives that are within the scope of their functional limitations, interests, aptitudes and abilities.
- Training may be provided by proprietary, business, trade or technical training institutions, however schools offering non-degree programs will be required to sign an agreement (Form 90-940-732) with VR before the school will be listed, and VR funds can be authorized.
- Investigation and approval of proprietary schools for use by VR will be conducted by designated VR staff.
- Once approved, an official listing sheet will be added to the approved proprietary school listing.

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1500.2.2 Unlisted Training Programs

- When the school and/or certificate program is not listed in the approved proprietary school listing, the VR counselor will need to take the following action:
 - Consider and document why this school has been chosen over other VR approved schools.
 - Consider and document how this school/program will assist the client in meeting their vocational goal and securing employment.
 - Review with District Supervisor and Regional Manager to pursue approval of the unlisted program.
 - Regional Manager will forward request to the designated VR staff for Vocational/Proprietary Schools, for follow up with the school, and await a response before making a commitment or issuing an authorization.

1500.2.3 Initial Considerations

- Training and related secondary services such as books/supplies and transportation are based upon financial need.
- VR financial application must be completed unless the client is an SSI/SSDI 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

1500.2.4 Informed Choice

- Provide informed choice regarding the following:
 - Transferability of degree/certificate/course credits
 - Program requirements result in training-related employment
 - Physical features of campus
 - Disability related support services

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- Disability related medical needs/access to emergency care
- Client participation in the cost of the program
- Grants
- Cost-effective training program comparison

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1500.2.5 Apply Nearest Tax Supported College Guideline

- The cost of education is based on the nearest Missouri tax supported two (2) or four (4) year college, appropriate for the client to reach their vocational objective or the actual cost of the training, whichever is less.
- 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, or the actual cost of the training, whichever is less.
- For clients enrolled in proprietary degree programs, the cost of education is also based upon the nearest Missouri tax supported two (2) or four (4) year college.
- Tuition for In-State/Out-of-State Proprietary, Business, Trade or Technical School Training: The listing sheet for each school's program will reflect tuition amounts based upon instructional terms or weeks. Apply the nearest Missouri tax supported college two (2) or four (4) year rate per credit hour multiplied by the number of weeks divided by the number of terms equals the total amount to be authorized for tuition/fees (rate x weeks ÷ terms = total).
- The school's listing sheet may show the total cost of training and cost per term, as well as the VR maximum amount which can be authorized.
- **The VR maximum amount should only be authorized if one of the following exceptions has been granted (must be well documented and supported in the case file):**

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1500.2.5 Apply Nearest Tax Supported College Guideline (continued)

- The required courses for the specific job objective are not available at the nearest tax supported two (2) or four (4) year college.
- The nearest tax supported two (2) or four (4) year college does not provide appropriate services for the client's disability related needs.
- Cost comparison has determined it is more cost effective to attend the specific program.

1500.2.6 Training Program Comparison Form

- Complete the "[Training Program Comparison Form](#)" to document/justify the expenditure of funds only if authorizing services for higher cost training, when a more cost-effective training program is available.

1500.2.7 Grants and Gift Aid ([CSG 640](#))

- 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 "Free Application for Federal Student Aid" (FAFSA), if the school is a participant in the grant program.
 - Submit a copy of Student Aid Report (SAR) to the school's Financial Aid Office (if applicable) and also to the VR counselor.
 - Provide a copy of the Financial Aid Award Letter prepared by the school to the VR counselor.
- Any money received from grants must be applied to the educational costs authorized by VR. This applies to all certificate/degree programs regardless of where they are offered.

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1500.2.7 Grants and Gift Aid ([CSG 640](#)) (continued)

- The client must have a completed SAR (if applicable) before an authorization can be prepared for tuition. The following exception may be made for training programs having a limited number of start dates (three or fewer per year):
 - Upon receipt of the SAR, the Pell grant will be applied to the prorated unused portion of the authorization(s), and any remaining balance must be used to reduce the costs to VR for the next instructional period.
 - Without the SAR, VR may develop an IPE and authorize services only for the first instructional period.

1500.2.8 Attendance Policies/Termination

- The school must apply the same attendance policy to VR students that is applied to non-VR students.
- The school's attendance policy may be waived only when the school and the Vocational Rehabilitation counselor are in agreement. This waiver is official only when written, signed by both parties, and placed in the VR client case folder.
- A school may require a client to make up days missed according to the school's written make-up policy.
- Training can be terminated by the school and/or VR counselor. Any action to terminate a client shall be initiated or confirmed in writing by the vendor or the Division of Vocational Rehabilitation.

1500.2.9 Satisfactory Progress

- For certificate programs, a monthly report of progress, signed by the client, is to be submitted to the counselor. The school may use VR's "Monthly VR Client Attendance and Progress Report" or their own report of progress form.
- For degree programs, semester/trimester grade reports may be submitted in lieu of monthly progress reports to the counselor.

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1500.2.9 Satisfactory Progress (continued)

- Discuss progress, course changes, and any accommodation related issues of concern on a regular basis as specified in the IPE.

1500.2.10 Room and Board

- Room and board may be provided for a client when required to relocate more than 45 miles from their residence in order to successfully participate in the 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 proprietary/technical/trade school in the VR Fee Schedule in MoRIS.
- For clients residing off-campus, and attending either a proprietary/technical/trade school that does not have on-campus housing or an unlisted proprietary/technical/trade school; room and board should be authorized in accordance with the “**monthly allowable amount for clients not living in dorms**” listed in the MoRIS Fee Schedule at the nearest state supported college, or the actual cost of housing, whichever is less.
- For clients required to relocate to the Kansas City/St. Louis area to participate in a proprietary/technical/trade school training program that does not offer on-campus housing, apartments or hotels with approved vendor numbers may be found in the VR Fee Schedule in MoRIS by selecting “Other-Housing”. The counselor is also encouraged to contact the **Western Rehab. Liaison or Eastern Liaison Counselor** for assistance.

1500.2.11 VR Liaison

- Utilize the VR liaison in St. Louis or Kansas City for follow-up when clients have to relocate to attend training.

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1500.2.12 Course Changes and/or Failing Grades

- Clients may be held responsible for the cost of tuition and/or required textbooks/training materials when courses have to be retaken due to poor grades, dropping and/or withdrawing; unless a credit or refund has been obtained.
- Occasionally the school will allow the client to re-take the phase/course at no additional charge, but this needs to be addressed directly with the school prior to the client re-enrolling.
- Exceptions may be made by the senior counselor when the reason for withdrawing, dropping and/or failing a course is disability related. Probationary counselors and counselors must have district supervisor review and approval.

1500.2.13 Books/Training Supplies/Tools/Equipment

- Books, training materials, tools, equipment may be purchased for a client when required to successfully participate in the training program.
- Clients may be provided books and training materials in the amount specified on the VR Fee Schedule in MoRIS.

1500.2.14 Licensure/Permits/Professional Registrations

- Clients may be provided assistance with the cost of professional registrations, licensure, permit, or exam fees (i.e. cosmetology, nursing, real estate appraisers, etc.) if required in order for the client to obtain employment in their chosen field of training.

1500.3 Procedure

- Document informed choice regarding the client's vocational goal selection, and choice of training programs.
- If the training program is out of state, document whether other Missouri schools are available to train the client and list reasons this particular program was selected.

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1500.3 Procedure (continued)

- Collect required financial documentation, complete Training Program Comparison Form (if appropriate); and place in the financial section of the case folder.
- Before authorizing books/training materials/tools, contact the school and/or review the Placement Equipment “Available View” in MoRIS to determine if training materials are available for transfer.
- Obtain documentation of comparable services (SAR, Financial Aid Award Letter, etc.), and determine educational related costs.
- Apply comparable services, as appropriate.
- Complete the Cost Worksheet, if services are based on financial need or if there are comparable services.
- Follow current Ticket-To-Work Procedure.
- Review IPE for training and associated addendums with client, and prepare appropriate authorizations.
- The District Supervisor will review and approve all initial plans prior to service and will approve all plans for services costing \$10,000.00 or more. *Exception: Assistant Supervisor and Counselor IV will be exempt from these plan reviews.*
- Complete the “Counselor Comprehensive Assessment” form in MoRIS, if this is an initial IPE.
- Make Status 12 move, when appropriate no later than five days after initial IPE has been signed and approved.
- Send a copy of the IPE and authorizations to the client, and a copy of the authorizations to the school.
- Verify service has been initiated and make appropriate status move.
- Follow up with the client to monitor satisfactory progress, in accordance with the timelines stipulated in the IPE.

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1500.3 Procedure (continued)

- Obtain and review "Monthly VR Client Attendance and Progress Report" to ensure satisfactory progress. Progress reports should be filed in the academic and vocational information section of the VR case file.
- The IPE must be reviewed and developed with the client at least annually.
- If the client has not secured employment upon completion of training, develop a placement plan and move case to Status 20.
- Move to Status 22 when the client has obtained employment.
- A case may be closed Status 26 when the client has been successfully employed for 90 days, and the client has been contacted to verify job satisfaction.
- The case file must reflect substantial services leading to a positive employment outcome before the case can be closed successfully.

1500.4 Authorization and Billing

- Funds for training to include tuition fees, books/supplies may be issued through an IPE, in accordance with the fee numbers located on the VR Fee Schedule in MoRIS.
- Amendments:
 - All amendments to authorizations need to be completed in MoRIS and are not required to be retained in the case file.
 - The district office should notify the vendor of the change made by the amendment.
 - The beginning and/or ending dates may be changed from the original dates with an amendment. The beginning date may be changed to precede the original beginning date, with counselor approval.
 - The authorized amount may be increased or decreased, but can not exceed the maximum allowable.

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1500.4 Authorization and Billing (continued)

- When the unliquidated balance on the authorization equals \$0.00, the authorization is closed and cannot be amended in the district office. Exceptions should be requested through Tech Discussion in MoRIS.
- When an approved school increases its fees after authorizations have been written, the district office will need to amend all authorizations prior to the payment of the bill. The district office will need to cancel any terms the client has not actually started, and issue a non-diagnostic authorization with the updated fees (mark “yes” to correct an existing IPE) prior to payment of the bill.
- When the client's eligibility for PELL is unknown, and the school is a participant in grant programs, prepare an authorization for only one instructional period, and indicate PELL should be applied to reduce remaining balance of VR cost when received.
- If transfer tools/equipment/training materials are not available, new training materials may be authorized in accordance with the VR Fee Schedule in MoRIS, utilizing the appropriate service codes for tools/equipment (inventory and/or non-inventory – [\(CSG 1930\)](#)).
- A school which agrees to vend for transportation ([CSG 1800.2.5](#)) should receive an authorization indicating the amount and rate of transportation to be paid and the period for billing.
- When preparing an authorization for professional registration fees, note-taking, interpreter, or personal care attendant services ([CSG 2010](#)), apply best case practice.