

<p style="text-align: center;">CSG Client Services Guide</p>	<p>Date Issued 10/17/18</p>	<p>Subject Proprietary, Business, Trade, Career and Technical Training</p>	<p>Section 1500</p>
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Section 1500 PROPRIETARY, BUSINESS, TRADE, CAREER AND TECHNICAL TRAINING 2

1500.1 Purpose, Definition, Approval..... 2

1500.2 Initial Considerations..... 2

1500.3 Nearest Tax-Supported College Guideline..... 3

1500.4 Exceptions to the Nearest Tax-Supported College Guideline 4

1500.5 Training Program Cost Comparison..... 5

1500.6 Grants and Gift Aid (See CSG Section 600) 5

1500.7 Normal Course Load..... 6

1500.8 Courses Provided Online 7

1500.9 Attendance Policies/Termination..... 7

1500.10 Progress Report from Training Institution 7

1500.11 Grade Point Average (GPA) and Satisfactory Progress 7

1500.12 Licensure/Permits/Professional Registrations 8

1500.13 Books/Training Materials/Tools/Equipment..... 8

1500.14 Room and Board..... 8

1500.15 Unlisted Training Programs 9

1500.16 Procedure 9

1500.17 Authorization and Billing.....10

[CSG TABLE OF CONTENTS](#)

Federal Regulations

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

State Rules

[5 CSR 20-500](#)

[TRAINING INSTITUTION AGREEMENT](#)

<p style="text-align: center;">CSG Client Services Guide</p>	<p>Date Issued 10/17/18</p>	<p>Subject Proprietary, Business, Trade, Career and Technical Training</p>	<p style="text-align: center;">Section 1500</p>
---	--	--	---

Section 1500 PROPRIETARY, BUSINESS, TRADE, CAREER AND TECHNICAL TRAINING

1500.1 Purpose, Definition, Approval

- 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.
- Training may be provided by approved proprietary, business, trade or technical training institutions.
- Investigation and approval of proprietary schools for use by Vocational Rehabilitation (VR) will be conducted by designated VR staff.
 - Approvals may be at the training institution or program level.
 - One-time approvals do not need agreement signature.
- Schools offering non-degree programs will be required to sign the Training Institution Agreement with VR before the school will be listed, and VR funds can be authorized.
- Career and technical schools associated with local school districts are not required to enter into the Training Institution Agreement with VR. Programs offered to adults at these schools are eligible for VR funding. The Career and Tech Listing includes a roster of courses available at each school, contact information and procedure code information. Counselors should contact the school to obtain costs.

1500.2 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

<p style="text-align: center;">CSG Client Services Guide</p>	<p>Date Issued 10/17/18</p>	<p>Subject Proprietary, Business, Trade, Career and Technical Training</p>	<p style="text-align: center;">Section 1500</p>
---	--	--	---

- Cost-effective training program comparison
- Unlisted Training Program process, if applicable
- Training and related secondary services such as books, training materials, maintenance and transportation are based upon financial need.
- 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.
- Proprietary schools may require VR clients to enter into contracts, which covers, among other things, costs of training and payment terms. These contracts are separate from the Training Institution Agreement that schools enter into with VR.

As part of offering informed choice, counselors should be aware that these contracts may exist. If a client is considering attending a school with such a contract, the counselor should discuss with the client the contract's terms and responsibilities. The counselor is not responsible for advising the client to sign, or not sign, but rather ensure the client is fully informed that such a contract may be required by the school.

1500.3 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.
- 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

<p style="text-align: center;">CSG Client Services Guide</p>	<p>Date Issued 10/17/18</p>	<p>Subject Proprietary, Business, Trade, Career and Technical Training</p>	<p style="text-align: center;">Section 1500</p>
---	---------------------------------	---	---

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 based on the nearest Missouri tax-supported two (2) or four (4) year college rate.
 - The maximum tuition for in-state/out-of-state proprietary, business, trade or technical school training reflects tuition amounts based upon instructional terms or weeks.

Formulas:

- $(\text{The nearest Missouri tax-supported college two (2) or four (4) year rate per credit hour} \times (\text{number of weeks of the program})) = (\text{VR maximum for the program}).$
- $(\text{VR maximum for the program}) \div (\text{number of terms}) = (\text{total amount to be authorized per term (for tuition)}).$
- The approved Proprietary School Listing shows the total cost of training and cost per term, as well as the VR maximum amount, which can be authorized. The listing for each school's degree programs reflects the maximum payable based on University of Missouri – Columbia (UMC) current rates.

Note: UMC's rate is the maximum; however, if the cost is less in the client's local area, the local rate must be used.

1500.4 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 program is not located in the 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.

<p style="text-align: center;">CSG Client Services Guide</p>	<p>Date Issued 10/17/18</p>	<p>Subject Proprietary, Business, Trade, Career and Technical Training</p>	<p style="text-align: center;">Section 1500</p>
---	--	--	---

- 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 folder.

1500.5 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 training when a more cost-effective training program is available.
- Document cost comparison of training programs, if applicable, using the Training Program Comparison form, Cost Scenarios, or a case note.

1500.6 Grants and Gift Aid (See [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 Student Aid Report (SAR) to the school’s financial aid office and also to the counselor.
 - Provide a copy of the Financial Aid Award Letter prepared by the school 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.

<p style="text-align: center;">CSG Client Services Guide</p>	<p>Date Issued 10/17/18</p>	<p>Subject Proprietary, Business, Trade, Career and Technical Training</p>	<p style="text-align: center;">Section 1500</p>
---	--	--	---

- 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 to ensure removal of default status prior to completion of training, and
 - VR assistance with the cost of training-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 completion of training.
 - Exceptions may be made with supervisory review and approval.
 - Document the rationale for the exception in the case file.

Note: Some training institutions do not participate in federal financial aid programs. If this is the case, guidance related to applying for/utilizing federal and state aid may not apply.

1500.7 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 term, 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.

<p style="text-align: center;">CSG Client Services Guide</p>	<p>Date Issued 10/17/18</p>	<p>Subject Proprietary, Business, Trade, Career and Technical Training</p>	<p style="text-align: center;">Section 1500</p>
---	--	--	---

1500.8 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.

1500.9 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 counselor are in agreement. This waiver is official only when written, signed by both parties and placed in the client case file.
- A school may require a client to make up days missed according to the school's written make-up policy. Additional costs may accrue based on these absences and may be charged to the client. VR cannot pay for the make-up days; therefore, the client may be responsible for these costs. Any disability-related exception requires supervisory review and approval.
- Training can be terminated by the school and/or VR counselor. Any action to terminate a client shall be confirmed in writing by the school or VR.

1500.10 Progress Report from Training Institution

- 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." A school may use its own report of progress form with prior approval by designated VR staff.
- For degree programs, semester, quarter, trimester or term grade reports may be submitted in lieu of monthly progress reports to the counselor.

1500.11 Grade Point Average (GPA) and Satisfactory Progress

- Clients must acquire and maintain at least a minimum cumulative grade point average (GPA) of 2.0 for VR to continue to participate in the cost of training.

<p style="text-align: center;">CSG Client Services Guide</p>	<p>Date Issued 10/17/18</p>	<p>Subject Proprietary, Business, Trade, Career and Technical Training</p>	<p style="text-align: center;">Section 1500</p>
---	--	--	---

- Clients must provide the counselor with a copy of their grade report after each semester, quarter, trimester or term that documents hours taken, hours completed, grades for each course and GPA.
- 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, 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.
- Occasionally the school will allow the client to re-take the phase/course at no additional charge. This needs to be addressed directly with the school prior to the client re-enrolling.

1500.12 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.

1500.13 Books/Training Materials/Tools/Equipment

- Books/training materials/tools/equipment may be purchased for a client in the amount specified on the approved Proprietary School Listing. Any discrepancy between the school's stated amount and the amount found in the approved Proprietary School Listing should be discussed with designated VR staff.

1500.14 Room and Board

- Room and board may be provided for clients when required to relocate more than 45 miles from their residence in order to successfully participate in a training program.

<p style="text-align: center;">CSG Client Services Guide</p>	<p>Date Issued 10/17/18</p>	<p>Subject Proprietary, Business, Trade, Career and Technical Training</p>	<p>Section 1500</p>
---	---------------------------------	---	--------------------------------

- 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 approved Proprietary School Listing.
- Security deposits may be provided if required for a client to participate in a VR-approved program.
 - 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 that does not have 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.

1500.15 Unlisted Training Programs

- When a school and/or program (degree or certificate) is not listed in the approved Proprietary School Listing, the counselor will take the following actions prior to making a commitment to provide these services:
 - Consider and document how this school/program will assist the client in meeting his or her vocational goal and securing employment.
 - Review with the district supervisor/assistant district supervisor and regional manager to obtain agreement to seek approval of the unlisted training program.
 - Upon agreement, the regional manager will forward the request to the designated VR staff for follow-up with the school.
 - If an unlisted school is approved for use, the school will need to complete the necessary steps to become a vendor ([CSG Section 700](#)). Once the school is established as a vendor, an authorization may be issued.

<p style="text-align: center;">CSG Client Services Guide</p>	<p>Date Issued 10/17/18</p>	<p>Subject Proprietary, Business, Trade, Career and Technical Training</p>	<p style="text-align: center;">Section 1500</p>
---	--	--	---

- If an unlisted program is approved at a school that is already a vendor, an authorization may be issued when approval for the program is given.

1500.16 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.
- Obtain and review "Monthly VR Client Attendance and Progress Report" and/or grades to ensure satisfactory progress.

1500.17 Authorization and Billing

- Funds for proprietary, business, trade and technical training may be authorized in accordance with the approved Proprietary School Listing. If a course is provided online at a rate differing from the typical rate at the

<p style="text-align: center;">CSG Client Services Guide</p>	<p>Date Issued 10/17/18</p>	<p>Subject Proprietary, Business, Trade, Career and Technical Training</p>	<p style="text-align: center;">Section 1500</p>
---	--	--	---

training institution, an exception may be granted with supervisory approval.

- The amount approved for books and training materials on the approved Proprietary School Listing may be authorized.
- 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](#).
- When preparing an authorization for training tools/equipment, see [CSG 1900](#).
- When preparing an authorization for note-taking, interpreter and/or personal care attendant services, see [CSG 2000](#).

CSG Client Services Guide	Date Issued 10/17/18	Subject Proprietary, Business, Trade, Career and Technical Training	Section 1500
--	--	--	-----------------------------------

- 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.