Section 600 FINANCIAL GUIDELINES

600 DETERMINATION OF FINANCIAL NEED

600.1 Financial Considerations

- Although eligibility for vocational rehabilitation (VR) services is not based on financial need, certain services have a financial requirement prior to the provision of those services, and the counselor must complete a financial needs assessment (FNA).

- Counselors should have knowledge of the client’s financial circumstances in order to provide appropriate counseling, guidance, and planning for the client’s individual rehabilitation program.

- Client/spouse/parent(s) should be encouraged to contribute toward the cost of services even if participation is not required per the FNA.

- Comparable services, including but not limited to, federal and state financial aid, Medicaid, Medicare, private insurance, family and voluntary contributions,
or other agency assistance must be used to meet, in whole or in part, the cost of VR services.

- All guidelines referred to in this section also apply to any service provided in Post-Employment Service (PES).

### 600.2 Needs Assessment
- Client/spouse/parent(s) are expected to participate in the cost of VR services as determined by a FNA.
- A needs assessment involves a determination of the client/spouse/parent(s) ability or inability to procure certain services needed through the client's and family's (parents) resources.
- A needs assessment also involves a determination of the extent to which VR will provide certain services to the client who is unable to procure them without VR assistance.

### 600.3 Responsibilities
- The counselor must advise the client of services that are available and the condition upon which the individual qualifies for such services. Client responsibilities are to be outlined and reviewed on the IPE.
- The client responsibilities as described on the IPE or IPE addenda include but are not limited to:
  - Progressing toward an employment outcome
  - Completing and returning a Financial Application annually
  - Providing documentation of client/spouse/parent(s) adjusted gross income (copy of federal income tax return, untaxed income and benefits for the most recent tax year, and if applicable, out-of-pocket disability-related expenses approved by VR)
  - Providing supporting documentation when the client/spouse/parent(s) reports current income/untaxed income and benefits, which may include but is not limited to, pay check stubs, award letter, copy of benefit check or bank statement with payment verification
  - Applying for all comparable services available
o Informing the counselor of any changes in plan of rehabilitation, income, marital status, etc.
o Participating in the costs of services as much as possible

600.4 Client Resources

• Evaluation of the client’s resources involves the income of the client/spouse/parent(s).

• Clients and/or client’s parents (if client is a dependent) who are recipients of public assistance (TANF or GR) will not be required to complete a Financial Application. However, the case file must contain documentation on an annual basis to substantiate public assistance.

NOTE: Food stamps are excluded from VR’s definition of public assistance, because an individual’s eligibility for food stamps may fluctuate from month to month.

• Clients who have been determined eligible for Social Security benefits under Title II (SSDI) or Title XVI (SSI) are exempt from financial need determination and will not be required to complete a Financial Application. Any applicant, who has been determined eligible for Social Security benefits under Title II and transitions from SSDI to Social Security retirement benefits upon reaching full retirement age, would also be exempt from financial need determination. However, the case file must contain documentation on an annual basis to substantiate receipt of Social Security benefits.

• The client/spouse/parent(s) must provide copies of the most recent federal income tax return along with a completed Financial Application before eligibility for services based on financial need can be determined, unless the client is a recipient of public assistance or SSI/SSDI as specified above.

600.5 Independent Status

• A client is determined independent when he or she meet any one of the following criteria:
o Is 23 years of age or older
o Is a veteran of the U.S. Armed Forces
o Is an orphan or a ward of the court
o Has legal dependents other than a spouse
o Is married and not claimed as an income tax exemption during the current tax year
o Is unmarried and not claimed as an income tax exemption during the past two tax years
o Exceptions may be granted if the client has been determined independent by another federal or state entity.

- If the client is considered an independent, the counselor will need to obtain a copy of the client’s federal income tax return along with a completed Financial Application (unless exempted under 600.5).

### 600.6 Dependent Status
- A dependent is defined as a client who does not meet any of the criteria as an independent individual.

- If the client is claimed as a dependent, the client must provide a copy of the federal income tax return on which he or she was claimed for the most recent tax year and complete a Financial Application (unless exempted under 600.5).

### 600.7 Financial Application
- Financial need will be determined by the counselor from information obtained from the client as recorded on the Financial Application. Supporting documentation may be required as noted on the Financial Application.

- The client’s (or client’s parents’) income listed on the Financial Application may be reduced by the amount of documented disability-related expenses for the client or family member, while receiving services under an IPE. A reduction should not be made if VR or other resources are paying the costs of the disability-related expenses.

- Documented disability-related expenses may include the anticipated amounts to be paid for medication, therapy, medical treatment, prosthetic appliances, repairs to equipment, etc. not covered by insurance, Medicare, Medicaid, VR or other third-party payees.

- The reason(s) for significant discrepancies in income between the past tax year and income reported for the current tax year should be included in the comments section on the Financial Application.
• Signature of the parent(s) or the person to whom the client is financially dependent is required on the Financial Application. The client must sign if the definition of an independent is met.

• The Financial Application is valid for twelve (12) months from the date the Financial Application was signed by the client and/or parent/guardian, unless the financial circumstances change.

• The counselor will not be able to provide services based on financial need if the client/guardian or client’s parents refuse to sign the Financial Application or do not provide the required documentation to determine financial need.

• For clients who are only eligible for Special Training Allowance, document on the Financial Application the following comment: I understand the only financial needs-based service I am eligible for is Special Training Allowance.

• A new Financial Application and determination of financial need is required when the following occurs:
  o The financial circumstances of the client and/or parent/guardian changed affecting eligibility for services based on economic need.
  o Additional services based on economic need are planned which extend beyond the twelve (12) month period of the previous Financial Application.

600.8 Cost Scenario

• FNA is required for services based upon financial need:
  o Annually
  o If financial circumstances change
  o When there are client/parent(s)/guardian contributions

Note: For clients receiving public assistance or SSI/SSDI/TANF, document receipt of these benefits on the FNA.

• The counselor will complete a Cost Scenario, which will demonstrate the costs of the needed rehabilitation services, comparable services available, client participation and how these will be utilized, and amount of VR funds to be used.

• A Cost Scenario is required:
  o when comparable services are available and will be utilized to meet the cost of services, in whole or part; and/or
o when there is voluntary or required client/parent(s)/guardian financial participation in the cost of services

o If the calculated amount of VR participation in the cost of training services is less than the established amount for the Special Training Allowance (described below), the client may choose to use the Special Training Allowance if the client receives no other services, other than training, based on financial need.

Note: A Cost Scenario is not required if comparable services and client participation are documented on the IPE.

600.9 Income Table

- The counselor will utilize information obtained from the Financial Application and compare it to the Income Table. This will determine VR’s participation toward the cost of services and to calculate the amount, if any, the client will need to contribute toward the cost of services.

<table>
<thead>
<tr>
<th>ADJUSTED GROSS INCOME LEVELS</th>
<th>185% Poverty Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>(for Services Based on Financial Need after 6-13-2019)</td>
<td></td>
</tr>
<tr>
<td>MONTHLY</td>
<td>ANNUAL</td>
</tr>
<tr>
<td>One (1) person</td>
<td>$1,926</td>
</tr>
<tr>
<td>Two (2) persons</td>
<td>$2,607</td>
</tr>
<tr>
<td>Three (3) persons</td>
<td>$3,288</td>
</tr>
<tr>
<td>Four (4) persons</td>
<td>$3,970</td>
</tr>
<tr>
<td>Five (5) persons</td>
<td>$4,651</td>
</tr>
<tr>
<td>Six (6) persons</td>
<td>$5,333</td>
</tr>
<tr>
<td>Seven (7) persons</td>
<td>$6,014</td>
</tr>
<tr>
<td>Eight (8) persons</td>
<td>$6,695</td>
</tr>
<tr>
<td>Nine (9) persons</td>
<td>$7,377</td>
</tr>
</tbody>
</table>

Note: Poverty level as established by the U.S. Department of Health and Human Services.
600.10 Required Client Participation

- Client/spouse/parent(s) income above the “Adjusted Gross Income Level” must be used to reduce VR financial participation in the cost of rehabilitation services.

- Depending on the cost of services, and how much the client/family income actually exceeds the VR income level, the counselor may still be able to provide some assistance with the cost of services.

- Document in the file the cost of VR services minus comparable services and/or client participation to reflect the possible amount to be authorized by VR.

- The counselor should consider the following “formulas” when calculating the amount of required client participation:
  - Training - Maintenance - Transportation – The amount of monthly income greater than the VR income level multiplied by the number of months of service.
  - All Other Services - The amount of monthly income above VR income level multiplied by the number of months based upon the actual cost of services.

600.11 Client Participation Chart

- Utilize the following chart to calculate required client participation amounts when providing services such as purchasing computers, van modifications, prosthetics, etc.

- When the client/spouse/parent is over income guidelines and the planned services provided by VR fall under the “All Other Services” category, the number of months on the financial needs assessment is determined by the cost of services.
### 600.12 Special Training Allowance for Individuals above 185% Income Levels (and do not receive any services based on financial need other than training)

- The client must be enrolled in a college/university, proprietary school, business school, CRP/skills training, career and technical centers, etc., which has been approved by VR.

- The counselor will utilize information obtained from the Financial Application and compare it to the Income Table to determine eligibility to receive the Special Training Allowance.

- Individuals who exceed 185% of poverty level and do not receive any services based on financial need other than training, may be eligible to receive the Special Training Allowance (up to $2,000) toward tuition, fees, books and required supplies per 12-month period.

- The training institution will be notified regarding authorized Special Training Allowance funds (regardless of vendor). This is done to assist the training institution in preventing an over award of financial aid to the student.

- The Special Training Allowance may not supplant other federal or state grants or scholarships in meeting the educational costs established by the VR agency.
610 SERVICES BASED ON FINANCIAL NEED

610.1 Services Based on Financial Need

- In accordance with federal regulations, VR may provide the following vocational rehabilitation services to individuals based on financial/economic need:
  - Physical and/or mental restoration, including but not limited to hospitalization, medical treatment, surgery, dentistry and prosthesis
  - Training, including tuition, fees, books, supplies, training materials and other services associated with training
  - Maintenance
  - Transportation
  - Placement tools, including initial stock and supplies associated with placement
  - Self-employment Rehabilitation technology services, including assistive technology devices and services to assist the individual to achieve an employment outcome
  - Home modification or remodeling
  - Vehicle modification
  - Services to family members to assist the individual to achieve an employment outcome
  - Note-taking services, not involving sign language interpretation
  - Other goods and services not listed above to assist the individual to achieve an employment outcome

620 SERVICES NOT BASED ON FINANCIAL NEED

620.1 Services Not Based on Financial Need

- The following VR services may be provided to individuals regardless of financial need:
  - Medical diagnostic services including medical and surgical examination, psychiatric evaluation, dental examination, inpatient hospitalization for specific identified vocational rehabilitation diagnostic and evaluation services including room, board and other services provided by the facility, clinical laboratory tests, diagnostic x-ray procedures and other medically recognized diagnostic services
o Psychological diagnostic services including psychological tests and measurements, intelligence tests, achievement tests, assessment of social functioning, educational achievement and other recognized diagnostic services
o Social and vocational diagnostic services including evaluation of the individual's employment opportunities and objectives in light of personality factors, intelligence level, educational achievements, work experience, vocational aptitudes and interests, and personal and social adjustment
o Maintenance when required to enable the individual to participate in diagnostic evaluation or vocational evaluation/assessment services
o Transportation when required to enable an individual to participate in diagnostic evaluation or vocational evaluation/assessment services
o Assessment for determining eligibility and vocational rehabilitation needs
o Vocational rehabilitation counseling and guidance, including information and support services to assist an individual in exercising informed choice
o Referral and other services necessary to assist in securing needed services from other agencies/programs, including other components of the statewide workforce development system
o Interpreter services for deaf or non-English speaking individuals when necessary to participate in a rehabilitation plan. Note-taking services that include interpreter services are not based upon the individual’s financial need
o Personal assistance services required to enable the individual to participate in the rehabilitation plan
o Job search and job placement services necessary to assist an individual in looking for employment opportunities and obtaining suitable employment to include job development, job retention, and follow-up/follow-along services (All other need-based services required during the training such as maintenance and transportation will be based on financial need.)
o On-the-job training fees to assist an employer with the cost of training an individual on the job (All other need-based services required during the training such as maintenance and transportation will be based on financial need.)

o Employment Services/Supported Employment Services to provide short- or long-term job coaching in order to assist an individual in learning job-related skills required to meet the vocational objective/goal (All other
need-based services required during the training such as maintenance and transportation will be based on financial need."

630 COMPARABLE SERVICES/BENEFITS

630.1 Availability of Comparable Services

- Federal regulations require that before an accommodation, auxiliary aid or service or any VR service, unless exempted, is provided to an individual with a disability or to members of that individual's family, it must be determined whether comparable services and benefits exist under any other program, and whether those services and benefits are available to the individual.

- If comparable services or benefits exist under any other program, and are available to the client, VR must use those comparable services or benefits to meet in whole, or in part, the costs of VR services.

- If comparable services or benefits exist under any other program but are not available at the time services are to begin, VR services must be provided until those comparable services and benefits become available.

- It is not the intention of VR to supplant any comparable services or benefits that may already exist and are available to the client but rather to supplement such services when necessary to reach an employment outcome.

- While clients receiving SSI, SSDI or TANF benefits do not need to provide information regarding financial need, they are still required to make application for all available comparable services and benefits.

- It is the counselor's responsibility to ensure application is made.

- Comparable services and benefits need to be considered during IPE development, and if obtained, they must be marked on the IPE. These include, but are not limited to:
  - Adult Education and Literacy Programs
  - American Indian VR Services Program
  - Centers for Independent Living
  - Child Protective Services
  - Community Rehabilitation Programs
- DOL Adult, Dislocated Worker and Youth Program
- Educational Institutions (elementary/secondary)
- Educational Institutions (postsecondary)
- Employers
- Employment Networks (not otherwise listed)
- Federal Student Aid (Pell, SEOG [Supplemental Educational Opportunity Grant], work-study, etc.)
- Intellectual / Developmental Disabilities Agency
- Medical Health Provider (public or private)
- Mental Health Provider (public or private)
- One-stop Employment/Training Centers
- Other State Agencies
- Other VR State Agencies
- Other WIOA-funded Programs
- Public Housing Authority
- Social Security Administration (Disability Determination Service District Office)
- State Department of Correction/Juvenile Justice
- State Employment Service Agency
- Temporary Assistance for Needy Families (TANF)
- Veterans’ Affairs
- Veterans’ Health Administration
- Wagner-Peyer Employment Service Program
- Welfare Agency (state or local government)
- Workers’ Compensation

630.2 Services Exempt from a Determination of the Availability of Comparable Services and Benefits

- Assessment for determining eligibility, priority of services and VR needs
- Counseling and guidance, including information and support services to assist an individual in exercising informed choice
- Referral and other services to secure needed services from other agencies, including other components of the statewide workforce development system
- Community Rehabilitation Program (CRP) Training Services:
Employer-Based Transition Training (EBTT)
Employment Services (ES)
Employment Services Plus (ESP)
Individual Placement with Supports (IPS)
Skills Training Programs (to include books, tools, training materials)
Supported Employment (SE)

- Job-related services, including job search and placement assistance, job retention services, follow-up services and follow-along services.
- Rehabilitation technology services to include rehabilitation engineering and assistive technology devices/services
- Post-Employment Services (PES) listed above

**630.3 Services Requiring Full Consideration of Comparable Services/Benefits**

- The following services require full consideration of comparable services under any other program before VR funds can be utilized to provide the service. The counselor must instruct the client to search and apply for comparable services and benefits before VR funds are authorized.
  - Training (college, proprietary, vocational-technical, business-trade)
  - Physical or mental restoration
  - Maintenance and/or transportation (non-diagnostic)
  - Services to family members
  - Interpreter services for the deaf
  - SE follow-along services
  - Personal assistance services
  - Occupational licenses, placement tools, equipment, initial stocks/supplies
  - Transition services
  - Other goods and services

- An exception to full consideration may be made when such a determination would delay or interrupt
  - the progress of the client toward achieving the employment outcome identified in the IPE;
  - an immediate job placement; or
o the provision of VR services to a client who is determined to be at extreme medical risk (risk of substantially increasing functional impairment or risk of death based upon medical evidence provided by an appropriately qualified medical professional) if medical services are not provided expeditiously.

630.4 Authorizing VR Funds

- VR funds may be authorized in the following situations:
  o Comparable services and benefits are not available.
  o Comparable services and benefits are available and application has been made.
  o Comparable services and benefits are probable (e.g., client has applied for financial aid but financial aid award letter/student aid report (SAR) has not yet been received).

- Clients requesting assistance with the cost of training at a college, university, proprietary school or other vocational/technical school must complete the FAFSA (Free Application for Federal Student Aid) in accordance with the following guidelines before VR funds will be authorized:
  o Client completes/submits FAFSA (if school is a recipient of federal funding)
  o College/school receives copy of FAFSA SAR
  o College/school prepares financial aid award letter outlining federal grants and/or campus-based gift aid that has been awarded to the client

EXCEPTION: If the client has submitted a FAFSA application but has not received his or her SAR, or the college/school has not completed the financial aid award letter, by the time VR funds need to be authorized, the counselor may authorize funds for one semester only or until comparable services/benefits have been awarded, whichever comes first. Services may not be authorized for any subsequent semesters until client and/or parents have completed the process to determine the amount of comparable services available.

- If comparable services/benefits are awarded, obtain a copy of the financial aid or other benefits award letter(s), and apply those funds toward the cost of services planned in the IPE.
- Include a summary of the type and amount of comparable services/benefits received in the Source of Comparable Benefit section(s) on the IPE.

- Documentation of the search for and application of comparable services and benefits must be in the case file and may include any or all of the following items:
  - Case notes
  - Correspondence
  - Application results
  - SAR (FAFSA)
  - College/school financial aid award letters, scholarship letters
  - Financial Application
  - FNA/Cost Scenario
  - IPE

630.5 Utilizing Comparable Services on the IPE

- When comparable services are applied and cover all of the agency allowed costs,
  - under the "planned services" item(s) on the IPE, list the source, amount of comparable services and how they are being utilized toward the cost of rehabilitation services.
  - under the "participant responsibilities toward the cost of the plan and securing comparable benefits" item on the IPE, include the participation by client/parents in the costs of rehabilitation services.

640 FEDERAL GRANTS AND GIFT AID

640.1 Definitions

- The following definitions are applicable to obtaining and utilizing federal grants and gift aid:
  - Educational Costs – agency-established educational costs refer to those costs for primary rehabilitation services (tuition and fees) and secondary rehabilitation services (books, supplies, maintenance and transportation) established in accordance with agency rules.
  - Federal Financial Aid – refers to federal basic grant entitlements under the Student Financial Aid programs of the Department of Education and
includes the Federal PELL Grant, Federal Supplemental Educational Opportunity Grant (FSEOG) and Federal Work-Study.

- **Gift Aid** – refers to grants or scholarships awarded to the student that are transferable to other colleges/universities.
- **Campus-based Gift Aid** - refers to grants or scholarships awarded to the student that are not transferable to other colleges/universities.
- **FAFSA** – used to apply for the PELL grant and other federal financial aid.

### 640.2 Mandatory Application

- 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 **FAFSA**
  - Submit a copy of the SAR to the college financial aid office and to the VR counselor

- Each client must provide the counselor with documentation of the results of all applications for comparable services (e.g., SAR, award letter, scholarships). All clients are required to provide a copy of the financial aid award letter prepared by the college to the VR counselor.

### 640.3 Applying Federal Grants and Gift Aid

- For students attending in-state public, private or out-of-state colleges, universities or proprietary training programs, federal grants and gift aid (transferable to other colleges/universities) should be applied toward the educational costs established by the VR agency prior to the utilization of VR funds.

- Exception: Individuals may apply federal grants and gift aid to reduce their participation in the educational costs if required to relocate and attend out-of-state programs to achieve the mutually agreed upon vocational objective
  - because the required courses for the specific vocational objective are not available, or
  - for disability-related needs (e.g., students who are deaf that require special communication and support services).
640.4 Applying Awards/Scholarships/Campus-Based Gift Aid
- Awards and/or scholarships that are transferable to other colleges/universities should be applied toward the educational costs established by the agency prior to the utilization of VR funds.
- Campus-based gift aid that includes awards/scholarships that are not transferable to other colleges/universities may be applied to reduce the client’s educational costs established by the school rather than just those costs established by the agency.

640.5 Applying Work-Study and/or Student Loan
- Clients are not required to obtain loans or to participate in a work-study program; however, money received from either may be used for educational costs not covered by VR.

640.6 Owe a Grant Refund and/or in Loan Default
- Under Title IV of the Higher Education Act, in order to receive a grant, loan or work assistance, a student must not owe a refund on grants previously received or be in default on any student loan.
- A client who owes a refund on a Title IV grant should make repayment arrangements with the post-secondary institution that made the grant.
- A client who has defaulted on a student loan may not be awarded his or her degree (associate or bachelor), or receive an official college transcript until default status has been removed. Therefore, a client should make repayment arrangements with the post-secondary institution/loan holder to ensure removal of default status prior to degree (associate or bachelor) completion.
- For purposes of determining eligibility for a PELL grant, a client who has previously defaulted on a Title IV loan is considered to no longer be in default status if:
  - The holder of the loan (name should appear on the SAR) certifies, for the purpose of reinstating Title IV eligibility, that the borrower has made satisfactory arrangements to repay the defaulted loan through one of the following methods:
    - Repay or satisfy the loan in full.
- Make six (6) agreed upon monthly payments over a six (6) month period. Once eligibility to receive additional federal financial aid has been restored, the individual must continue to make timely monthly payments to maintain eligibility.
- Consolidate the loan through the loan consolidation program.
- Rehabilitate the loan through the loan rehabilitation program by making nine (9) full payments of an agreed upon amount over a ten (10) month period to the U.S. Department of Education.
  - The loan is discharged in bankruptcy.

640.7 Failure to Remove Default Status

- If the client is not eligible for grants and/or gift aid because they are in default on a student loan
  - the client needs to provide the counselor with documentation regarding repayment arrangements with the post-secondary institution/loan holder 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 must be approved by the district supervisor.

640.8 Utilizing Comparable Services

- Federal grants and/or gift aid should be applied to agency allowed educational costs (e.g., tuition, books, supplies, room and board charges) first and any balance applied to other educational costs identified on the IPE (e.g., transportation, childcare) prior to issuing an authorization for VR funds.

640.9 Eligibility for Federal Grants/Gift Aid Is Unknown

- Develop an IPE/authorization for one semester if the SAR/financial aid award letter has not been received prior to the first semester of college training.
- Services may not be authorized for any subsequent semesters until client and/or parents have completed the process to determine the amount of comparable services available.
- The authorization must indicate: "The amount billed must be reduced by all applicable federal and state needs-based aid."
- Services to a proprietary school may not be authorized until eligibility for federal grants and gift aid has been determined. As per the proprietary school agreement, the following exceptions apply:
  - For programs having three or fewer start dates per year, VR may authorize services for the first instructional period without the SAR.
  - Upon receipt of the SAR, any grants/gift aid will be applied to the prorated unused portion of the authorization(s). If any portion of the grants/gift aid cannot be applied to the first instructional period, the balance must be applied to the next instructional period.

640.10 Denial of Services
- If the client and/or parents refuse to apply for comparable services as indicated in these policies, no service based on financial need will be provided until a determination regarding comparable services can be made.
- If the client and/or parents refuse to make appropriate repayment arrangements with the post-secondary institution/loan holder to ensure removal of default status prior to degree completion as indicated in these policies, no college-related training service will be provided until default status has been removed.

640.11 Eligibility for Federal Grants/Gift Aid after Authorization Issued
- Upon receipt of the financial aid information, the counselor must apply the amount of federal grants/gift aid award to those services authorized. If the award cannot be applied to the costs of the current semester, it must be applied toward amounts to be authorized for the next semester.

640.12 Financial Aid Notification
- Notify the financial aid office the amount of VR financial participation being provided toward the cost of education. Include the amount of Maintenance and/or Transportation being provided, if applicable.