

**GOVERNMENT OF THE DISTRICT OF COLUMBIA  
DEPARTMENT ON DISABILITY SERVICES**



<b>PROCEDURE</b>	
Subject: Postsecondary Education and Training Procedures	Procedure No.: 2014-RSA-PR002
Responsible Program or Office:  Rehabilitation Services Administration – Client Services	Effective Date: July 29, 2014  Number of Pages: 12
Cross References, Related Policies and Procedures, and Related Documents: Section VI Policy Manual, Services relating to Post-secondary Education and Training Section V Policy Manual, Economic Needs and Comparable Benefits Guidance Email from RSA Deputy Director dated 2/19/2013	

**1. PURPOSE**

The purpose of this procedure is to outline steps and serve as a guide in authorizing Post-Secondary Education and Training and services related to it.

**2. APPLICABILITY**

This procedure applies to all VR Specialists, supervisors, administrators, people that DCRSA serves (hereinafter referred to as people/ person/ individual) and their families and advocates, and stakeholders of the DC Rehabilitation Services Administration.

**3. PROCEDURES**

**A. Procedure for Authorizing Postsecondary Education and Training Service**

Once a person is determined eligible for vocational rehabilitation services and s/he will require further training or education to make him or her employable:

1. The VR Specialist shall conduct a comprehensive assessment to include a review of psychological evaluation/ medical records/ vocational assessment/ transcripts of prior training and labor market to determine the unique strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice in accordance with the requirements of the Rehabilitation Act of 1973.

2. The VR specialist shall establish that the person has resolved student loan/s or obtains a waiver from the Department of Education regarding any defaulted student loan pursuant to 29 DCMR § 122.2 ( c ).
3. The person, with the assistance of the VR specialist, shall identify an employment outcome consistent his or her interests, aptitude, abilities and informed choice.
4. The person, with the assistance of the VR specialist, shall identify a suitable training or education that will be consistent with employment goal and informed choice. The approved training or education should be required to achieve entry-level position in the person's chosen field.
5. The person, with the assistance of the VR specialist, shall identify a post-secondary institution which will provide the training or education in line with the employment goal and consistent with informed choice. Efforts will be made to explore locally available options within the Washington DC Metropolitan area first. The VR specialist shall provide information about locally available training or educational options in the person's chosen field.
6. The financial participation form shall be completed before the IPE development and updated annually during the annual review to determine the person's cost of participation or each time there is a change in the eligible person's financial status in accordance with 29 DCMR § 124.3.
7. Once a post-secondary institution has been identified, the VR specialist may authorize fees necessary for admission to the institution (e.g, application fees, placement fees, admission tests).
8. After the person applies for admission to a postsecondary institution, acceptance or any decision letter will be filed in the record of services.
9. The person shall apply for financial aid annually and submit a copy of Student Aid Report. (See Section B(1) ). Federal VR funds cannot be used to pay training costs in institutions of higher education unless ***every effort has been made to secure financial assistance, in whole or in part, from other funding sources.***
10. The VR specialist and the person will discuss any need for reasonable accommodations in the educational setting and will discuss the role of the disability services coordinator in approving any requests for accommodations. The VR Specialist will encourage the person to register with the Disability Support Services.
11. For those continuing training, the VR Specialist shall review the student's academic performance in the previous term and/ or complete annual review if applicable. The ***cumulative grade point average*** (2.0 or C or better) should be reviewed at the end of each academic year pursuant to 29 DCMR § 122.12 (a) and should be the basis of approval of continuous training support for the following academic year.

Due to the foregoing, processing of authorization should not be delayed:

- a. If the grades are not yet available during in-between terms (before the Winter quarter or Spring semester).
- b. If the GPA is below 2.0 for only one term/ semester/ quarter/ grading period. Counseling and guidance should be provided to make sure that the individual seek appropriate academic support.

12. If the individual is placed on probation and fails to maintain the required cumulative “C” average (2.0), funding for training the following term or semester cannot be authorized pursuant to 29 DCMR §122.14. This may be reconsidered only if the individual provides documentation of successful completion of C or better while maintaining a full-time schedule at a post-secondary educational institution for one semester consistent with 29 DCMR § 122.15.
13. The VR Specialist shall refer to the institution’s website for current costs and fees as well as current academic/ course catalogs.
14. The VR Specialist shall verify financial aid utilizing the Student Aid Report and/or a VR Exchange Form/ Statement of Account from the school indicating the grants available to the individual. The VR Specialist shall determine financial assistance only after the results of the SAR and the financial aid award letter are known, and after the financial participation and any comparable benefits have been applied.
15. The VR specialist must document in the case notes any or all decisions with regards to the services that will be provided in the IPE and the applicable regulation/s or policy that guided such decision/s:

SERVICE	APPLICABLE REGULATION
Training Program and Tuition Cost Limit	29 DCMR § 122.3 – 122.6
Graduate Education	29 DCMR § 122.23
Room and Board	29 DCMR § 122.9
Transportation	Section F

16. The person and the VR Specialist shall jointly develop the Individualized Plan for Employment (IPE) to include approved training consistent with employment goal at a postsecondary institution and other related services or amend accordingly. This should be in accordance with the mandatory components of the Plan as outlined in 29 DCMR § 111:

COMPONENT	SYSTEM 7 FIELD
a. A description of the specific employment outcome that is chosen by the eligible individual consistent with the individual's unique strengths, resources, priorities,	Employment Goal

concerns, abilities, capabilities, career interests, and informed choice;	
<p>b.A description of the specific rehabilitation services that are:</p> <p>(1)Needed to achieve the employment outcome, including, as appropriate, the provision of assistive technology devices, assistive technology services, and personal assistance services, including training in the management of those services; and</p> <p>(2)Provided in the most integrated setting that is appropriate for the services involved and is consistent with the informed choice of the eligible individual;</p>	Objectives
c.Timelines for the achievement of the employment outcome and for the initiation of services;	Plan begins on (date) and is estimated to end on (date)
d.A description of the entity or entities chosen by the eligible individual or, as appropriate, the individual's representative that will provide the vocational rehabilitation services and the methods used to procure those services	Services
e.A description of the criteria that shall be used to evaluate progress toward achievement of the employment outcome; and	Evaluation Criteria
<p>f.The terms and conditions of the IPE, including, as appropriate, information describing:</p> <p>(1)The responsibilities of the Rehabilitation Services Administration;</p> <p>(2)The responsibilities of the eligible individual, including:</p> <p>(A)The responsibilities the individual will assume in relation to achieving the employment outcome;</p> <p>(B)If applicable, the extent of the individual's participation in paying for the cost of services; and</p> <p>(C)The responsibility of the individual with regard to applying for and securing comparable services and benefits as described in section 114; and</p> <p>(3)The responsibilities of other entities as the result of arrangements made pursuant to the comparable</p>	Individual Understanding, Responsibilities, Rights, Remedies and Informed Choice

services or benefits requirements in section 114.	
---	--

17. The VR Specialist shall authorize and process payment for the identified services in the plan to the postsecondary institution and/or any provider of training-related services or materials. The VR Specialist shall authorize payment for the individual's postsecondary educational expenses only after all grant award funds have been applied toward educational expenses, including tuition, books, and specific fees.

a. Authorization for Training or Education will be issued on an individual school term basis (semester/ quarter/ grading period)

b. Authorization for books, tools, training-related materials, services or assistive technology (See Section E) will be issued to the school bookstore/ approved vendor or through purchase card as appropriate

#### B. Application Procedure for Financial Assistance

The following procedures will be followed in applying for financial assistance from Rehabilitation Services Administration (RSA) for postsecondary education expenses:

1. The individual shall submit a financial aid application annually in accordance with 29 DCMR § 122.2 (d) to the following:
  - a. The post-secondary institution the individual is attending or to which the individual has applied;
  - b. The D.C. Tuition Assistance Grant, if applicable;
  - c. All other District or state funded educational assistance programs and school grants or financial aid;
  - d. The U.S. Department of Education (The Free Application for Federal Student Aid (FAFSA));
  - e. All federal grant programs, including the Pell Grant; and
  - f. The Leverage Educational Assistance Program (LEAP);
2. The eligible individual/individual's family shall complete DCRSA's Financial Participation Form to determine the individual/family annual contribution for services.

The following person(s) are exempt from the financial needs test and are not required to contribute to the cost of vocational rehabilitation per 29 DCMR § 124.5:

- a. A ward of the District of Columbia Government committed to the jurisdiction of the Child and Family Services Agency, or its successor agency;
- b. A recipient of Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI);

- c. A client of the Economic Security Administration (formerly known as Income Maintenance Administration) or its successor agency, who meets the requirements for Income Maintenance Administration-related rehabilitation programs or;
- d. An eligible individual receiving another form of public assistance income as defined in the federal Social Security Act of 1935. (e.g. TANF, SNAP, WIC etc.)

However, if the individual chooses an out-of-state institution, the individual/individual's family will still be responsible for additional expenses beyond the limitations set by 29 DCMR § 122.3 – 122.6 even if they are exempt from the financial needs test.

3. If the individual's parents/family members are required to provide financial information on the FAFSA, i.e., the student is not considered "independent" for purposes of federal student financial aid, the parents/family members must provide financial information as supporting documentation to the Financial Participation form to determine the individual/family annual contribution for postsecondary education expenses.

This does not apply to individuals identified above as exempt from the financial need test.

The following may be used to calculate an eligible individual's financial contribution toward the cost of vocational rehabilitation in accordance with 29 DCMR § 124.10 (a) (1):

- a. The annual gross income listed on the Internal Revenue Service (IRS) Form 1040, 1040A, or 1040EZ of the eligible individual, parent or guardian, and any relevant schedules, forms or supplemental documentation or supporting information listed on the IRS Form 1040, 1040A, or 1040EZ; or
  - b. Original copies of documents by verifying the annual gross income of the eligible individual, parent, or guardian, if he or she is ineligible to file a federal tax return pursuant to IRS guidelines, or has otherwise not filed a federal tax return.
4. The individual or, as appropriate, the individual's representative, will sign a "Release of Confidential Information" and/or a Postsecondary Financial Aid Verification form, authorizing the exchange of information between the VR Specialist and financial aid administrator in accordance with 29 DCMR § 122.2 (f).
  5. The VR Specialist shall request a verification of Financial Aid (e.g. VR exchange form) from the financial aid administrator and/or review the Student Aid Report (SAR) and shall utilize this information to determine financial assistance.

C. Calculation of Amount of Financial Assistance

After the Educational Expenses have been determined, the VR Specialist will:

1. Add

a. The Individual/Family Annual Financial Participation amount indicated in the Financial Participation Form. The annual contribution may be prorated accordingly, depending on the number of terms per year that the student enrolls in.

b. The total amount of grants and scholarships awarded (See Section D of this procedure).

2. Subtract the total of the individual participation as determined by Section B (3) and grants/scholarships (Section B (5) ) from the total of the Educational Expenses. The remainder is the amount of DCRSA financial assistance for the semester/grading period that shall be in accordance with the limitations set in 29 DCMR § 122.4, 122.5 and 122.6 of the District's municipal regulations.

3. Indicate the postsecondary education costs to which RSA and the individual/family's participation amount will be applied in the Individualized Plan for employment (IPE).

4. The VR specialist and the individual shall sign and date the completed IPE.

D. Procedures in the use of Scholarships and Grants

For public, merit based scholarships or grants, or any private scholarships or grants, the determining factor for how the agency should calculate the effect of the grant on our support, is whether the scholarship or grant is restricted or unrestricted (i.e., is the money intended for only a particular purpose, such as tuition).

1. Restricted Scholarship or Grant

If the scholarship or grant is restricted, the amount awarded should be applied to the expense to which it was restricted. For example, if a consumer receives a grant that is restricted to payment of tuition, the amount of tuition owed would be reduced by the amount of this grant. The agency's level of support would then be based on this revised tuition amount, based on the federal requirement that restricts DCRSA in paying for expenditures that are "necessary and reasonable."

2. Unrestricted Scholarship or Grant

In the case of an unrestricted grant or scholarship, the individual is free to use these funds in any manner he or she wishes. However, the individual must share with the VR specialist how the funds are used. If the individual's use of these funds decreases an expense for which RSA is providing support, then RSA's support is decreased by this amount. There may be circumstances, however,

where the grant or scholarship would be used for other purposes and would have no effect on the support provided by RSA. For example, the individual could use the grant to pay for expenses that RSA does not support (e.g., tuition to take a course which the student previously failed; tuition to attend part-time summer school; expenses related to a school program involving study abroad; expenses for room and board in situations where RSA is not funding room and board).

Examples:

***Public, Needs Based Scholarships or Grants***

Example 1: The individual attends the University of Maryland Eastern Shore. There was a similar program available at a local college, however, the individual chose to attend the out of state school. Therefore, the agency's level of support is limited to three times the UDC rate for tuition ( $3317.64 \times 3 = 9952.92$ ); and the agency does not fund room and board (per 2007 29 DCMR § 122.9), as the individual had a locally available option that did not require room and board. The tuition and fees per semester for an out of state resident are 7424.50. The cost for room and board per semester is \$4375. Transportation costs to/from school each semester, plus on trip home for Thanksgiving and Spring Break is 280 miles round trip ( $280 \times .555$  per mile = 155.40 per trip, two trips per semester = 310.80).

Given: The student receives a Pell Grant and Tuition Assistance Grant (TAG) from OSSE. The Pell Grant is in the amount of \$2500 per semester. The TAG is in the amount of \$4068 per semester (TAG pays the difference between in-state and out of state tuition at public four year colleges, up to \$5000 per semester; it also pays up to \$1250 per semester for Historically Black Colleges; UMES is both a public state school and a HBCU, so TAG would pay the higher of the two ; i.e., up to \$5000 – the difference between in state and out of state for UMES is \$4068). Therefore, the calculation would be as follows:

Tuition (and fees):	7424.50	Room and Board:	4375.00
Pell Grant	- 2500.00		
TAG	- 4068.00		
	<u>856.50</u>		

However, the agency's support for this individual is limited to paying up to 9952.50 per semester for tuition. Also, the Pell Grant may be used for either Tuition or may also be used for other school related expenses (e.g., books, room and board). Therefore, the above example should be calculated as follows:



Tuition and fees	\$ 7424.50	Room and Board	\$ 4375	Total per Semester	\$11,799.50
Pell Grant		less	( 2500)		( 2500.00)
TAG	(4068.00)				(4068.00)
Agency Support	( 3356.50)				3356.50
Consumer's Amount	00		\$ 1875.00		\$1875.00

The individual is also still responsible for the cost of transportation to and from school, as there was a locally available option, and there are no transportation costs associated with going back and forth to class each day. The only cost is to travel to and from the out of state school.

***Private, Needs Based Grant***

Example 2: The individual attends Landmark College in Vermont. The individual and her IEP team identified Landmark as the most appropriate post-secondary institution, in order to address the individual's learning disabilities. The VR specialist did not participate in the IEP meetings or engage with the individual in counseling and guidance to make an informed choice regarding her options. The student applied for admission only to this one school, based on the IEP team's plans. The agency initially refused to support Landmark, as the individual intends to study computer science, and there are locally available options. However, the individual filed an appeal and the Office of Administrative Hearings ordered the agency to pay tuition, room and board, consistent with the agency's policies and procedures. Landmark College has awarded the student a \$15,000 grant per school year, to be applied to tuition. This is a "restricted, private grant." The student also received a Pell Grant in the amount of \$5000, per year. The student applied for TAG, but this is only available to support public or historically black colleges, neither of which apply.

Tuition and fees	\$ 24,500	Room and Board	\$ 4770	Total per Semester	\$29,270
Landmark Grant	(7,500)				
Pell Grant	(2,500)				
Agency Support	\$14,500		\$4770		\$19,270

**Private Merit Based Grant**

Example 3: The individual is in his second year in Howard University’s Graduate School of Social Work, pursuing his MSW. The tuition and fees are 9,000 per semester. The student received a merit based scholarship in the amount of 10,000 because he was the student with the highest GPA in his first year of study. The scholarship must be paid to the University, but it is otherwise unrestricted. The VR specialist meets with the consumer to ask how he intends to use the scholarship. The individual reports that Howard has a program in international social work practice over the Winter Break that involves a five week course of international social work practice, studying and living in South Africa. The cost of the program is \$5000. The individual would like to participate in this program, and plans to use the rest of the scholarship for tuition.

Tuition (and fees)	\$ 9,000.00	Room and Board	N/A
Scholarship	(5,000.00)		
Agency Support	\$ 4,000.00		

E. Purchase of Training-Related books, computer, tools, supplies, assistive technology, uniform and/ or service

1. Through the school bookstore or approved vendor

- a. The individual approved for training shall submit a required list of books or tools to VR specialist on official institution letterhead or as published in school website, catalog or syllabus and/or online student account.
- b. If it is a request for a computer and it is not available through other resources (e.g. Project Reboot) per 29 DCMR § 120.13, the request should be accompanied by documentation from the relevant University personnel (e.g. Chairman of the relevant Department or director of a training program) consistent with 29 DCMR § 120.11.
- c. The VR specialist shall review the request, document the action taken and reflect this in the IPE. The VR specialist and the individual shall sign and date the completed IPE.
- d. Authorization for purchase of requested books and/or training materials will be issued to the school or approved vendor.

2. Through the agency purchase card

- a. If the requested books/ uniform/ training materials need to be obtained from other than the school or approved vendors, the VR specialist may need to consult with staff who handles purchasing for suggestions of vendors (i.e. Reiter’s for books, Modell’s for uniform etc. ) or may need to exercise due diligence in researching for vendors.

- b. Once a vendor is identified, a price quote may need to be requested from the vendor.
  - c. Once a price quote is available, purchase of requested items will be included in the IPE as "Other Services" and will be documented accordingly in case notes. The VR specialist and the individual shall sign and date the completed IPE.
  - d. Authorization for purchase of items (not otherwise available in schools or approved vendors) will then be issued to RSA staff with purchase card together with item or product description and a price quote.
  - e. The RSA staff responsible for purchasing the requested items will keep the VR specialist apprised of the order status and once the item/s is/are delivered.
  - f. Once the requested items are available for pickup, the VR specialist will notify the person accordingly.
3. Through reimbursement or payment of maintenance
- a. The individual shall inform and secure prior approval from the VR specialist before procuring required tools or materials related to training consistent with 29 DCMR § 122.11.
  - b. If the books/ uniform/ training materials/ tools are purchased out-of-pocket by the individual and a claim for reimbursement is submitted, documentation of requirement must be submitted along with the receipts in accordance with 29 DCMR § 120.11.
  - c. The VR specialist will review the request and claim for reimbursement, document the action taken in case notes and include this in the IPE as service for Maintenance. The VR specialist and the individual shall sign and date the completed IPE.
  - d. Authorization to Client for approved expenditures will be generated for the Finance Unit to process the reimbursement or payment ***subject to supervisor's review and approval***. The individual may expect the check to be received within 10 days upon processing.

F. Transportation

Procedure: The VR specialist shall review the individual's need for transportation that will allow him or her to travel to and from school based on the following guidance. The VR specialist shall document the action taken in case notes and reflect this in the IPE if considered. The VR specialist and the individual shall sign and date the completed IPE.

Guidance: Transportation costs for VR services may be paid at the usual rates not to exceed the State allowed rate. Transportation costs can only be paid as an auxiliary service to core VR services. Transportation is not a stand-alone service.

1. Within the Washington DC Metropolitan Area

Transportation may be paid if the individual lives at home and daily transportation is required. Refer to Transportation Standard Operating Protocol Number 2013-RSA-Trans-001.

2. Outside of the Washington DC Metropolitan Area

If the training location is where the individual cannot live at home, transportation costs may be paid for the most a direct, one-way trip at the beginning of the training session using *the most economical mode of transportation*.

At the session's conclusion, transportation from the training location to the job site or home may be paid.

3. Public Transportation not available or accessible

If public transportation is not available for the individual because of disability, cannot travel by public transportation, the counselor should make every effort to negotiate an estimated cost of gas only if it is the least expensive travel cost.