IVRS Post-Secondary Financial Assistance		
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#### **SCOPE OF SERVICES**

Financial assistance within this policy is provided to job candidates participating in post-secondary education that results in a post-secondary credential. This is provided to students who are in good standing and making satisfactory progress toward their employment goal. The fee schedule rate calculates tuition and fees (not including application or equipment fees), supplies (not including equipment or tools), and books. IVRS post-secondary financial assistance is based upon the number of credit hours that the student is charged by the school. Summer tuition availability and rates are determined annually. A reduction in the total amount authorized from the fee schedule is only calculated when the IVRS post-secondary financial assistance through IVRS would reduce grants from Federal, State, and local governments, or non-merit scholarships. Staff should refer to the published fee schedule for established rates for post-secondary funding.

Rates are determined annually based upon the average prior year's cost of lowa institutes of higher education. Financial assistance is authorized directly to the institute.

Specialized programs designed specifically for individuals with intellectual, developmental, or similar disabilities (i.e. REACH, BUILD, NEXT), are not funded under the post-secondary training policy. Refer to the <u>Other Training policy</u> for funding of these programs.

#### AGENCY EXPECTATIONS

There are several considerations staff must be aware of prior to providing IVRS post-secondary financial assistance to a job candidate, to ensure decisions are being made through informed choice. These considerations are listed below and are required prior to any funds being expended. IVRS staff must summarize these discussions in the case notes.

*General Counseling and Guidance:* All job candidates considering post-secondary training must be provided with counseling and guidance. This discussion includes a review of the available training opportunities that offer a program of study related to the IPE goal. Accreditation of the post-secondary institution by the appropriate accrediting body is required, when applicable.

If through counseling and guidance it is determined that a job candidate is interested in an institution that is not accredited, additional discussions must occur to ensure the job candidate understands that the IVRS post-secondary financial assistance will not be applied to such institutions. Through these conversations, job candidates should be provided with alternative options that include accredited programs.

IVRS supports in-state public programs to the maximum extent possible. IVRS can consider programs that are disability-specific, private, or out-of-state, if the in-state public, or lower cost program would not meet an individual's disability-related or academic needs. Paying above the established rates would require an exception. IVRS is not responsible for ancillary costs (e.g., maintenance, transportation, personal assistance) when the job candidate chooses an in-state public program outside of their domicile if a similar program is offered within their domicile.

If the individual chooses an out-of-state or private program at a higher cost than an in-state program, if either program would meet the individual's rehabilitation needs, IVRS is not responsible for those costs (34 CFR 361.50(b)). If there is no public in-state program available, IVRS may support a private in-state program.

If a job candidate has graduated from a college program then requests IVRS funding to return to school to study a different discipline, the IVRS counselor should be involved in a conversation with the job candidate. Goals should be mutually agreed upon by the job candidate as well as the IVRS counselor.

Adding the private or out-of-state program to an IPE when there is a public in-state option is a decision that requires RSB Bureau Chief approval. The job candidate would be expected to prepare a justification for why the RSB Bureau Chief should approve the private or out-of-state program.

Job candidates must take a sufficient number of credit hours and make satisfactory academic progress according to the college major. If a job candidate chooses to attend part-time, they must present a plan completed with the school that demonstrates the classes to be completed on a part-time basis and still achieve the degree identified. The plan must be reviewed at the end of each term and modified based on the needs of the individual.

**Financial Literacy:** This discussion assures the job candidate understands the post-secondary programs available to them and the costs of such programs. It includes the specific costs associated with attending a particular post-secondary program and a discussion of how the job candidate plans on covering those costs remaining after IVRS financial assistance, grants, and non-merit scholarships are applied.

No IVRS post-secondary financial assistance should be authorized to job candidates in default on a student loan. The student must provide documentation that they have worked out a satisfactory repayment agreement prior to IVRS staff authorizing financial assistance.

IVRS does not authorize IVRS post-secondary financial assistance for job candidates currently on financial aid suspension due to failure to make reasonable progress, as defined by the school. The Financial Literacy Questions can assist staff in leading this discussion with the job candidate.

For students that must audit/retake courses, the maximum number of credit hours that IVRS can fund is 12 credit hours across a program of study.

Remedial courses are those courses that are necessary to assist the student to develop the academic background necessary to attend college. These courses are related to math, reading and writing and are designed to assist individuals in achieving a minimum level of success in college coursework. Remedial courses may be supported as long as the individual maintains satisfactory progress, and are funded based on the established rate for the program.

IVRS aligns the funding with FAFSA and 20% completion of the term of the program, when applicable. This is considered the service received date for authorization purposes. As a result, no pro-rating is allowed and assistance would be authorized for the start of the next term.

**Benefits Planning:** If an individual who receives a Social Security benefit is considering a private or outof-state program, counseling and guidance includes benefits planning. **Informed Choice:** IVRS staff notifies the job candidate of other programs that are less costly and offer the same vocational outcomes. Job candidates must be aware that, while it is their choice to attend any post-secondary education program of their choice, some programs and institutions have higher costs which may lead the job candidate to accrue additional post-secondary costs that are not the responsibility of IVRS. Through informed choice, the job candidate may choose the institution they prefer with the full understanding this choice may result in additional costs to the job candidate.

**Comparable Services and Benefits:** IVRS staff must determine whether comparable services and benefits are available to the individual, following the guidelines of the <u>Comparable Services and Benefits</u> policy. If such services or benefits exist and are available at the time of post-secondary planning, IVRS must use those services or benefits to meet, in whole or in part, the costs for the post-secondary program. If an entity other than IVRS is obligated to provide assistance with tuition, mandatory fees, books and supplies, then that entity would be expected to assist as IVRS cannot supplant the requirements of another entity.

IVRS expects all individuals seeking IVRS post-secondary financial assistance to complete the FAFSA as part of the comparable services and benefits search. No funds for training, in whole or in part, can be expended without a search for comparable services and benefits, based on that policy's guidelines. If an individual applies for FAFSA and is ineligible, conversation must occur to identify how the individual will fund the portion of training costs that IVRS is not assisting with.

IVRS does not consider merit-based scholarships as a comparable benefit. A merit scholarship a financial award given to a student based on their achievements, such as grades, test scores, or extracurricular activities. A non-merit scholarship is a financial award given to a student based on financial or other needs. A restricted scholarship includes any financial award that must be used to offset expenses outlined in the scholarship criteria (e.g., tuition and fees). An unrestricted scholarship includes any financial award that can be used at the individual's discretion.

IVRS does not consider unrestricted, merit-based scholarships as a comparable benefit for Social Security disability beneficiaries. However, if the student chooses to use those funds towards tuition and related expenses, then IVRS is obligated under the guidelines set forth in Uniform Guidance to take that reduction in expenses into consideration when calculating its own contribution for the student (per RSA guidance 1-19-2023). For job candidates who do not have Social Security disability benefits, the IVRS expectation is for these individuals to use unrestricted grants and scholarships towards the cost of tuition, fees, books and supplies. Any remaining funds may be considered as a comparable benefit and service for other vocational rehabilitation services related to their post-secondary costs.

**Unmet Need:** IVRS cannot pay more towards the cost of tuition and fees than is owed. Therefore, if an award reduces the amount owed for tuition and fees (restricted awards), IVRS must take it into consideration when calculating financial contributions towards program costs. Any remaining costs after following the provisions under the Comparable Benefits and Services and Unmet Need sections of this policy are the responsibility of the job candidate.

### **Additional IVRS Financial Considerations**

When a job candidate requests additional assistance for tuition, fees, books and supplies beyond the IVRS post-secondary financial assistance amount in the fee schedule, then staff may consider those

additional costs through an exception. When staff have completed their due diligence and believe additional funding is necessary to support more than the fee schedule amount, then an exception is requested justifying their support. No exception is allowed to go beyond unmet need.

### Services in Support of Post-Secondary Education

Some job candidates may identify additional services beyond the IVRS post-secondary financial assistance that are necessary to achieve the goal listed on their IPE. If IVRS does not support a particular post-secondary program, no financial assistance can be applied to ancillary services that are in support of that post-secondary program. Staff should refer to the appropriate policy when considering funding these services.

## PROCEDURES

When it does not reduce grants or non-merit scholarships from Federal, State or local entities, the total IVRS post-secondary financial assistance may be authorized, as identified in the fee schedule, up to unmet need. IVRS staff may need to communicate with the school the job candidate is planning to attend as well as any Federal, State or local entity providing scholarships or other assistance. If IVRS staff determine that IVRS post-secondary financial assistance reduces funding from any of those entities, then the amount authorized may be less than the total fee schedule amount, or no assistance at all, depending upon the impact on those comparable benefits.

The IVRS post-secondary financial assistance supports job candidates in a post-secondary program as follows (not to exceed unmet need):

## Community College Programs that Qualify for Federal Financial Aid

- When a job candidate is attending a program of study at a community college that **qualifies** for Federal Financial Aid, the amount authorized is based on the Community College Established Rate.
- Tuition should be authorized one term at a time.
- Include the service received date in the service description of the authorization.
- The service description may include information further describing the job candidate's enrollment (e.g., number of credit hours for the fall/spring term).
- Terms that begin after October 1<sup>st</sup> should be authorized on or after October 1<sup>st</sup>.

# Four-Year Institution Programs that Qualify for Federal Financial Aid

- When a job candidate is attending a program of study at a four-year institution, the amount authorized is based on the Four-Year Institution Rate.
- When a job candidate is attending a graduate program, the amount authorized is based on the Graduate Established Rate.
- When a job candidate is attending a post-graduate program, the amount authorized is based on the Post-Graduate Established Rate.
- Tuition should be authorized one term at a time.
- Include the service received date in the service description of the authorization.
- The service description may include information further describing the job candidate's enrollment (e.g., number of credit hours for the fall/spring term).

• Terms that begin after October 1<sup>st</sup> should be authorized on or after October 1<sup>st</sup>.

### All Other Programs

- When a job candidate is attending a program of study at another institution not mentioned above that results in a post-secondary credential, **regardless of whether the program qualifies for Federal Financial Aid**, the amount authorized is based on the Other Training Rate. Staff must contact the school to identify the length of the program.
- Authorizations should occur based on the way the program is arranged (e.g., semester, trimester, etc.).
- Authorize in accordance with the payment requirements of the program, or in alignment with the allowable payment plan for the training program. Example: a program that allows the student to make quarterly payments for a 12-month program. The Other Training Rate is applied to the total cost of the program, up to the unmet need, not the quarterly installments. In this example, each quarter IVRS will authorize the lesser of one fourth of the Other Training Rate or one fourth of the job candidate's unmet need.
- Specify the payment requirements, including the service received date of the program in the service description, if applicable. If this is not available, payment is processed when the job candidate has completed 60% of the program.

The following documentation must be received prior to IVRS staff identifying IVRS post-secondary financial assistance:

- Grades from prior term;
- Course schedule for next term;
- Financial Aid Award Letter;
- Projected bill provided by the institution (or obtained through the job candidate's account); and
- Current release of information for the institution.

Once the documentation is obtained, a conversation is held with the job candidate to determine how scholarships, grants, and other financial assistance will be applied across terms, to determine unmet need.

IVRS staff must utilize the Post-Secondary Worksheet when calculating the balance or unmet need and appropriate IVRS post-secondary financial assistance. The appropriate formula to use is based on the type of institution the job candidate attends and whether or not it qualifies for Federal Financial Aid.

At the end of each term, IVRS staff must discuss with the job candidate their progress in the program, including maintenance of the appropriate cumulative program GPA requirement. This includes updating performance measures within IRSS.

### EXCEPTIONS

- Not authorizing directly to the institute of higher education the job candidate is attending when the institute allows for overpayment and subsequent disbursement to the student.
- Funding for any out-of-state institution requires RSB Bureau Chief approval prior to adding to the IPE.

- Funding any private institution when there is an in-state public option available requires RSB Bureau Chief approval prior to adding to the IPE.
- Authorizing post-secondary financial assistance beyond the fee schedule amount identified in this policy (not to exceed unmet need).
- Authorizing for summer school when it has been determined that summer funding is not available.
- Exceeding the 12 hours of retaken or audited classes.
- Requesting funding for a job candidate that has defaulted on a student loan (evidence that the job candidate has made attempts to rectify the situation that are reasonable is required).
- Requesting funding for a job candidate that is on Financial Aid suspension.
- Authorizing post-secondary financial assistance when a job candidate has not met their cumulative GPA.
- Not transferring a student's case file to the IVRS staff where the institution or program is located that the job candidate is attending.
- Authorizing beyond any of the provisions set forth in policy.

# APPLICABLE FORMS, DOCUMENTS, LINKS

- <u>Comparable Services and Benefits Policy</u>
- <u>Request for Exception to Policy</u>
- Financial Literacy Questions
- Fiscal Year Determination Policy for VR Case Service Expenditures
- Other Training Policy
- Period of Performance Policy