

Agenda

SRC POLICY AND PROCEDURES COMMITTEE
Thursday, March 4, 2021 10:00 AM – 12:00 PM
Zoom (email kate.larose@vermont.gov for meeting access)

10:00 am – 10:02 am	Approval of Agenda (Sherrie Brunelle)
10:02 am – 10:05 am	Open for Public Comment (Sherrie Brunelle)
10:05 am – 10:07 am	Approval of Minutes (Chair) Minutes from January 7, 2021
10:07 am – 10:50 am	Self-Employment Update (Group)
10:50 am – 11:10 am	RSA Feedback (James Smith)
11:10 am – 11:15 am	Break
11:15 am – 11:50 am	Transportation (Group)
11:50 am – 11:55 am	Other Business (Group) A. Agenda Setting: May 6, 2021
11:55 am – 12:00 pm	Vote: Chair (Sherrie Brunelle)
12:00 pm	Adjournment (Chair)

*VR Policy & Procedures Manual Chapters can be found at
<https://vocrehab.vermont.gov/about-us/policy-and-procedure-manual>

Chapter 311:

Post-Secondary Education and Training

Vermont Division of Vocational Rehabilitation
Policy and Procedures Manual

Revision Date: November 2020

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Section 1. Definitions

- A. **“On the job training (OJT) agreement”** means DVR agrees to cover training costs associated with hiring a DVR consumer that go beyond what an employer would typically provide.
- B. **“Post-secondary training program”** means training that leads to an industry recognized credential or marketable skills needed by local employers.
- C. **“Post-secondary education”** means academic classes at an accredited college or university leading to a degree.
- D. **“Pre-apprenticeship program”** means a program that teaches basic technical and job readiness skills in preparation to enter a Registered Apprenticeship Program.
- E. **“Progressive education and training”** means Vermont DVR’s approach to promoting post-secondary education and training by offering graduated opportunities for consumers to explore options before deciding to enroll in an academic or training program.
- F. **“Registered apprenticeship program (RAP)”** means on the job training programs and related classroom instruction leading to an industry recognized credential. RAP participants are paid at least minimum wage while completing the program.
- G. **“Supported education”** means providing intensive supports for individuals with disabilities to allow them to participate in post-secondary education programs.

Section 2. General Policy

- A. There is substantial evidence that the achievement of post-secondary education and training credentials lead to higher wage and more stable employment. Therefore, it is DVR’s policy to support all consumers in considering their options for post-secondary education and training. This includes consumers with the most significant disabilities and consumers participating in supported employment programs.
- B. Many VR consumers have had negative education and training experiences in the past and may initially be reluctant to consider these options. To address this issue, DVR counselors are encouraged to use progressive education and training strategies (see Section VII) to introduce consumers to these options in a low-risk manner. Effective use of career assessment tools might also help guide a consumer to look at potential options they may never have considered.
- C. Ultimately, some consumers may decide they are only ready for entry level employment which is their choice. Regardless, it is an essential part of the VR counseling process to

support the consumer in exploring and considering education and training opportunities leading to higher wage employment.

- D. DVR may not place an absolute dollar limit on specific service categories or total services provided. However, DVR may set spending guidelines to ensure reasonable costs to the program. The guidelines may not be so low as to deny the consumer a necessary service.

The VR counselor may make an exception to the spending guidelines with the VR regional manager's approval.

- E. **When considering exceptions to the spending guidelines, the VR regional manager must consider the consumer's ability to contribute to their services. The consumer contribution must be:**

- A. reasonable.
- B. based on the consumer's financial need; and
- C. not so high as to effectively deny the consumer a necessary service.

- F. DVR cannot require consumers who are SSI or SSDI beneficiaries to provide funding towards their services, including post-secondary education and training. DVR also cannot require consumers to obtain student loans to provide funding for their education or training programs. These consumers are still required to apply for financial aid as outlined in policy.

Section 3. Post-Secondary Training Programs

General Description

- A. Post-secondary training programs resulting in industry recognized credentials can be a highly cost-effective strategy to help VR consumers achieve higher wage employment. Such programs can help consumers gain marketable credentials without incurring significant educational debt. These programs can also help meet the workforce needs of employers in Vermont. They also generally do not take a long period of time to complete, which may be important for consumers who need an income. Therefore, DVR strongly supports the use of post-secondary training programs that result in industry recognized credentials such as Licensed Nursing Assistant (LNA) or Commercial Driver's License (CDL).
- B. DVR also supports training programs that do not lead to a credential but can result in the acquisition of marketable skills. These types of programs provide the VR consumer the opportunity to develop skills that are clearly marketable to local employers.

Use of Assessment and Labor Market Information

- C. The VR counselor is encouraged to use vocational and career assessments as a guide to identify potential training opportunities that align with the consumer's interests and abilities.
- D. The VR counselor should utilize labor market information available through the Vermont Department of Labor (VDOL) to ensure the training is for employment opportunities that exist in the local area. The local Business Account Manager (BAM) can assist the counselor and consumer with this process.

Partnering with Organizations to Fund Training Opportunities

- E. The VR counselor must assist the consumer to research and apply for available funding for training programs, including Vermont Student Assistance Corporation (VSAC) non-degree grants and VDOL funds. The blending and braiding of funding can help minimize any costs to the consumer.

Post-Secondary Training Program Spending Guidelines

- F. DVR strongly supports consumer participation in post-secondary training programs that lead to an industry recognized credential or marketable skills through short-term and lower cost training and has set spending guidelines for each. VR counselors are encouraged to seek exceptions to the guidelines if additional financial support is necessary for the consumer to successfully participate in these programs. All exceptions must be approved by the VR regional manager.
 1. The spending guideline for post-secondary training programs leading to a credential is \$5,000.
 2. The spending guideline for costs of post-secondary training that does not lead to an industry recognized credential is \$1500 per case.
 3. The spending guideline for costs of ancillary financial support to complete a post-secondary training program is \$2,000 per training, based on consumer need.

Guidance:

DVR recognizes that many consumers may require additional ancillary financial support to complete a post-secondary training program. For example, many DVR consumers do not have the resources to stop working to complete a training program and may need help with general living costs. Other consumers may need funds to pay for the additional expenses associated with participating in such training. These funds are flexible and can be tailored to the support needs of the consumer. Financial support might include but is not be limited to:

- ⊕ Transportation costs.
- ⊕ Work clothing.
- ⊕ Childcare expenses.

- ⊕ Maintenance costs (rent, utilities).

End Guidance.

Section 4. On the Job Training (OJT) Agreements

General Description

- A. An OJT agreement is only allowable in a competitive employment setting where the VR consumer is hired directly by the employer.
- B. An OJT agreement is appropriate when a VR consumer requires more than the standard level of training available through an employer to be successfully employed at a specific job. For example, if the employer must assign a co-worker to provide extra training for the VR consumer for 40 hours over a four-week period, that expense could be covered by DVR in an OJT agreement.
- C. OJT agreements must not be used as an incentive or wage subsidy for employers.

Establishing OJT Agreements with Employers

- D. If the VR counselor and the employment team determine the VR consumer needs training beyond that which the employer typically provides, an OJT agreement is required. The agreement must be developed with the employer. The template agreement is VR-20.3 in the DVR forms set.
- E. The OJT agreement must specifically outline the required training to be provided by the employer and the cost.
- F. The BAM and/or the Employment Consultant will negotiate the terms of the OJT agreement, including the required skills gains the consumer must achieve. As part of the OJT agreement the employer must agree to provide documentation to verify measurable skills gains.

OJT Spending Guidelines.

- G. The spending guideline for an OJT is \$3,000 per agreement or the costs necessary to allow consumers with the most significant disabilities to obtain higher wage employment. Exceptions to this spending guideline require approval of the DVR regional manager
The amount of funds provided in the OJT agreement must be based on the actual costs that will be incurred by the employer to provide the additional training. These costs must be outlined in the OJT agreement.

Section 5. Registered Apprenticeship and Pre-Apprenticeship Programs

General Description

- A. DVR strongly encourages the use of Registered Apprenticeship Programs (RAP) and pre-apprenticeship programs to support consumers in achieving industry recognized credentials. Individuals who complete RAPs have been shown to achieve higher wages and substantially improved job retention.
- B. RAPs can be an excellent option for VR consumers who need immediate income, because they pay at least minimum wage while the participant is in training.
- C. While RAPs have been traditionally associated with the trades (plumbing and electrical), they can be used for a wide variety of professions including healthcare, construction, and financial services.
- D. The related instruction costs for RAPs are much lower than most post-secondary education programs and therefore do not result in significant educational debt for participants.

Requirements for RAPs

- E. Registered Apprenticeships allow consumers to work and earn money while also taking related instruction classes. Incremental wage increases are established by the employer at the start of the apprenticeship.
- F. The consumer will earn a nationally recognized credential that can be used in other states. In Vermont, a variety of colleges and training programs provide the related instruction, including the Career and Technical Education Centers, Community College of Vermont (CCV), and Vermont Technical College (VTC).
- G. DVR will support consumer participation in RAPs approved by the Vermont Department of Labor.

Requirements for Pre-Apprenticeship Programs

- H. Pre-apprenticeship means a program that teaches basic technical and job readiness skills in preparation to enter a Registered Apprenticeship Program.
- I. A pre-apprenticeship program can take many forms. It can provide classroom training and hands-on experiences related to an apprenticeship occupation. It can also include a paid work experience.
- J. The best pre-apprenticeship programs are set up with close collaboration between schools and a Registered Apprenticeship sponsor. Many pre-apprenticeship programs enable students to earn credit toward the completion requirements for a Registered Apprenticeship Program.

RAP and Pre-Apprenticeship Spending Guidelines.

- K. DVR strongly supports consumer participation in pre-apprenticeship and registered apprenticeship programs that lead to higher wage employment and has set funding guidelines for each. VR counselors are encouraged to seek exceptions to the guidelines if additional financial support is necessary for the consumer to successfully participate in these programs. All exceptions must be approved by the VR regional manager.
1. The spending guideline for a youth to participate in a pre-apprenticeship program is \$2,000 per event.
 2. The spending guideline for consumer participation in RAPs is \$5,000.

Guidance:

DVR generally doesn't provide ancillary supports such as transportation, clothing, and maintenance costs for VR consumers participating in a RAP. This is because individuals participating in a RAP are paid at least minimum wage during the apprenticeship. Exceptions to this spending guideline require approval of the DVR regional manager.

End Guidance

Section 6: Post-Secondary Education Programs

General Description

- A. Achievement of a post-secondary degree is strongly associated with higher earnings and more stable employment over one's lifespan. DVR strongly supports consumers participating in post-secondary education programs to improve their career options. It is important, however, to note the following:
1. DVR is not a general source of financial support for post-secondary education. DVR funding is intended to support services required to achieve an employment goal that best meets the needs and interests of the VR consumer. If an individual or their family is just seeking financial support for a post-secondary degree, they should be advised to seek assistance from VSAC state grants, Pell grants, and other sources of financial aid.
 2. Achievement of a post-secondary degree is not in itself an allowable goal for an Individual Plan for Employment (IPE). Participation in a post-secondary program must be necessary to achieve a specific employment outcome.
- B. DVR may support a post-secondary education program under the following conditions:
1. The VR consumer needs additional vocational rehabilitation services beyond assistance with college expenses such as assistive technology and job placement assistance in addition to a post-secondary degree.

2. Participation in the post-secondary education program is directly linked to the achievement of an employment outcome identified in the IPE.

Guidance: – Post-secondary education and employment goal.

- In some cases, this is very clear. For example, a consumer needs an associate degree in dental hygiene to become a dental hygienist.
- In other cases, the counselor and consumer must establish how the post-secondary program is necessary for the achievement of the employment outcome. For example, a consumer whose employment goal is marketing may need a BA degree in communications or a related field.
- The relationship between the post-secondary degree program and the typical requirements for the employment goal or field must be documented in the case record.

End Guidance.

Counseling and Guidance

- C. As noted, achievement of a post-secondary degree is associated with improved earnings and career prospects over one’s life span. However, enrolling in a post-secondary degree program is often a major time and financial commitment for a VR consumer. As part of the counseling and guidance process, the VR counselor should engage the consumer in an informed decision-making process about a college program. Some considerations that might be part of this process include:
 1. The acceptance, graduation, and placement rates of the program.
 2. The financial commitment involved in completing the program and the potential student debt.
 3. An understanding of the workload requirements.
 4. Family obligations and other commitments.
 5. Supports and accommodations the student may need, and the availability of and access to disability services.
 6. Differences between High School IEP (Individual Education Plan) supports and the supports a college is required to provide.
 7. The option of trying out one or more CCV classes before committing to a college degree program.
- D. In some cases, DVR consumers might not be aware of non-college options to achieve highly marketable credentials. Options such as apprenticeships or short-term training programs leading to industry recognized credentials can be much less expensive options for DVR consumers to achieve their employment goals.

Expectations for Engagement in the DVR Process

- E. The VR counselor must talk with the consumer about DVR’s expectations of them throughout their college experience. General expectations are:

1. Contact every month to six weeks to confirm the classes the student is taking and how they are progressing.
2. Scheduled phone calls at the start and end of every semester.
3. Specific IPE expectations including:
 - a) Maintenance of a 2.0 GPA or higher;
 - b) Requiring the student to send in grades at the end of each semester; and
 - c) Planning before each semester.
4. Determining what involvement DVR will have in job search after graduation (out of state consumers might need to be connected to other state VR agencies).
5. The VR counselor may add additional expectations based on individual circumstances.

Post-Secondary Education Spending Guidelines.

- F. DVR financial support for consumer participation at *institutions of higher education* can only be made in accordance with an appropriately completed IPE. DVR support is limited to education that is needed to achieve the *employment outcome* and only after maximum efforts have been made to secure comparable services and benefits or other assistance from sources outside of DVR to pay for the higher education program . These benefits include:
1. family contribution,
 2. basic grant entitlement under student financial aid programs,
 3. private or institution-based scholarships,
 4. tuition waiver,
 5. work-study, and
 6. earnings.
- G. The amount of support, from all resources, cannot exceed the cost of the education program. *It should be noted that for individuals who qualifies as low income through the Vermont Student Assistance Corporation are eligible for grant funding that would cover 100% of tuition at Community College of Vermont.* In some cases, DVR consumers might not be eligible for VSAC grants based on unpaid tuition from a prior college class or a loan default, regardless of the amount. In such circumstances, DVR may consider paying these costs to allow the consumer to become eligible for grant funds. The counselor must receive regional manager approval before covering this expense.
- H. The consumer must apply to the institution's financial aid office (FAO) and cooperate in the provision of all information required by the FAO in its calculation of the consumer's eligibility for financial assistance. This application must be made sufficiently in advance of the starting date of training so that the FAO has ample time to make its determination. In no case may this application be made less than 60 days before the start of training. DVR may deny support of training if the consumer fails to apply for financial aid in a timely manner or cooperate with the FAO or DVR in order that a determination of financial needs can be made. The consumer is required to give written authorization to

DVR and the FAO for them to exchange information regarding the determination of eligibility for financial assistance.

- I. After, the above conditions have been met, the spending guideline for *unmet financial need* is \$1,000 per semester for full-time matriculated students and \$500 per semester for part-time students. Exceptions to these guidelines require approval of the regional manager
- J. DVR has primary responsibility for disability-related expenses, such as personal care, personal assistants, or specialized tutoring, as appropriate to the successful completion of program, provided these services are not covered under the Americans with Disabilities Act.

Support for Out of State Programs

- K. DVR will support students attending out of state post-secondary education programs. However, the student must follow the requirements outlined in “Expectations for Engagement in the DVR Process” of this Section.

Support for Graduate Level Programs

- L. DVR will only support post-graduate programs that are required to meet the employment goal outlined in the IPE. For example, a consumer with a BA in English may need to complete a post-graduate program in education to become a teacher. Another example might be a consumer who needs a post graduate credential to advance in their current employment.

Section 7: Progressive Education and Training

- A. As noted in Section 2. B., many VR consumers have had negative experiences with education and training programs. Others may have no family history of education or training after high school and never considered it a possibility. As a result, these consumers may be reluctant to consider these options even if they offer the potential for greater earnings. The Progressive Education approach is a Vermont DVR initiative. It is intended to promote post-secondary education and training for VR consumers by offering them graduated opportunities to explore options before they fully enroll in a program.
- B. Examples of such exploratory activities might include:
 - 1. Utilization of career focused assessments to identify areas of potential interest.
 - 2. A tour of a college campus or training program.
 - 3. Introductory college courses such as CCV’s Introduction to College and Careers.
 - 4. Dual enrollment in college courses for students in high school.
 - 5. Auditing a class or training program.

6. A short-term training placement in the consumer's field of interest. For example, if a consumer is interested in nursing, a work experience in a healthcare setting would help them understand what is involved before they commit to a program.
7. Enrollment in a non-matriculated class to test a consumer's interest and ability to participate in a college program.

Section 8: Supported Education Programs

- A. DVR assists consumers participating in a variety of supported post-secondary education programs including Project Search, Succeed, Think College and others. Programs such as College Steps, College Compass, and Project Search have an internship component and promise a vocational focus as part of the student's plan. State colleges and universities provide opportunities for students to gain additional education and expand their career options.

Guidance: – Supported education spending guidelines.

High School Students

- If a student who is in high school chooses to participate in College Steps, SUCCEED, Think College, or other dual enrollment opportunities, DVR may provide financial support for books, supplies, assistive technology, transportation, or other related needs, if other funding is not available.
- DVR must not usurp any responsibilities that schools are required to provide as part of IEP and transition services.
- The student must have an open VR case and an IPE in place. The coursework must support the stated vocational/career goal(s) of the IPE.
- DVR will not pay college tuition for a student who is still in high school.
- Exceptions to these spending guidelines require approval of the DVR regional manager.

Consumers Who Have Completed High School

- In most cases participation in supported education programs is primarily funded through the Developmental Disabilities Services Division (DDSD) Medicaid Global Commitment funding. DVR will provide financial support consistent with Section 4 spending guidelines with the following exceptions:
 - Even though supported education programs may be part-time in terms of credits and classes, DVR recognizes participation is a full-time commitment for participants. Therefore, the spending guideline is \$1,000 per semester for unmet need.

- For students participating in supported education programs who are not receiving DDSD Medicaid Global Commitment funds, DVR can provide funding to support their attendance.
- For students who are participating in supported education programs already funded by DVR through contracts with post-secondary programs (i.e., College Compass), the VR counselor may authorize additional funding for books, transportation, and other expenses consistent with Section 6 spending guidelines.
- Exceptions to these spending guidelines require approval of the DVR regional manager.

End Guidance.

Chapter 313: Audiology Services and Hearing Aids

Vermont Division of Vocational Rehabilitation
Policy and Procedures Manual

Revision Date: November 2020

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Section 1. Definitions

- A. **"Audiology services"** means hearing assessment, diagnostic, and hearing aid fitting services provided by a licensed provider.
- B. **"Related diagnosis"** means Meniere's disease, vertigo, and tinnitus.

Section 2. Eligibility for Services Based on Hearing Loss or a Related Condition

General Requirements

- A. To be determined eligible for DVR services based on hearing loss or a related diagnosis, the applicant must:
 - 1. Meet all basic conditions of eligibility outlined in Chapter 203, Section III;
 - 2. Have an audiogram that is less than one year old; and
 - 3. Complete the Workplace Communication Assessment Tool. The assessment will help the VR counselor identify areas of functional loss and barriers to employment.
- B. When determining eligibility based on hearing loss or a related diagnosis, VR counselors are encouraged to consult with the DVR deaf services coordinator or a DVR rehabilitation counselor for the deaf if they have questions or need assistance in interpreting audiological assessments.

Requirements Based on Hearing Loss

- C. To be determined eligible based on hearing loss the applicant must have:
 - 1. At least 40 decibel loss in the better ear unaided, reference ANSI (American National Standards institute), PTA (Pure Tone Average). To find the pure tone average take the average of the three most severe consecutive decibel scores from the person's audiogram; or
 - 2. At least 30-39 decibel loss in the better ear unaided reference, ANSI, PTA with at least one of the following:
 - 1. Speech discrimination less than 75 percent; or
 - 2. A statement from a licensed audiologist or Ear, Nose, Throat (ENT) Otolaryngologist indicating progressive loss of 10 decibel or more, with the person in good health (no colds/flu symptoms) at the time of audiology testing.

Requirements Based on a Related Diagnosis

- D. An applicant may also be determined eligible based on a diagnosis of Meniere's disease, vertigo, and tinnitus. This is because these conditions can affect an individual's ability to hear and communicate in an employment setting. Hearing aids and audiology services can mitigate these issues and reduce the impact of these conditions.

Requirements Based on a One-Sided Hearing Loss

- E. Applicants can be found eligible for services based on one-sided hearing loss if:
1. The hearing loss is severe/profound, and a hearing aid will not be effective for that ear.
 2. They rely on the good ear to communicate and could benefit from hearing aid and audiology services.
 3. They provide an audiogram that is less than a year old showing a one-sided loss of 80 decibel loss or greater in the worse ear.
 4. Based on the Workplace Communication Assessment Tool, the counselor determines the applicant has significant functional barriers to employment.

Section 3. Hearing Aid and Audiology Services

- A. To be determined eligible and receive hearing aid services, an applicant must have an audiogram that is less than one year old.
- B. For audiogram testing and hearing aid services, we strongly recommend that a certified audiologist be used. This is based on their educational and training background in this specialized field of knowledge, and licensure with the Vermont Secretary of State's Office of Public Regulation (<https://sos.vermont.gov/opr/> under audiologist listing). If an audiologist is not available locally for a consumer, the counselor can refer them to a licensed hearing instrument specialist or dispenser.

Guidance: – Spending guidelines for exams.

Insurance typically will cover audiology exams annually/every 12 months, with and without Primary Care referral, depending on the insurance carrier. If the consumer does not have insurance, the VR counselor can provide funds towards an audiology exam and hearing aid test.

End Guidance.

- C. In most cases the audiologist or hearing aid vendor will provide a hearing aid recommendation. In some instances, however, an audiologist may feel the results of audiogram testing warrant medical follow up. The audiologist will discuss a referral to a licensed ENT with the patient/consumer to secure “medical clearance to obtain hearing aids” before providing a recommendation. The VR counselor should request a minimum of three hearing aid recommendations to ensure consumer choice around affordability and best fit for their hearing needs.
- D. The VR counselor will obtain the state contractual pricing through their local state hearing aid vendor and share this cost information with the consumer. The consumer will choose the model that best fits their needs. The VR counselor should inform the audiologist of the choice so they can schedule and prepare a fitting appointment.

Spending Guidelines for Hearing Aids

- E. DVR may not set an absolute limits on specific service categories or total services provided. However, DVR may set spending guidelines to ensure reasonable effective use of funds. The VR counselor may make an exception to the spending guideline with the approval of the VR regional manager.
- F. When considering exceptions to the spending guidelines, the VR regional manager must consider the consumer's ability to contribute to their services. The consumer contribution must be:
 - 1. Reasonable,
 - 2. Based on the consumer's financial need, and
 - 3. Not so high as to effectively deny the consumer a necessary services.
- G. DVR may contribute \$750 toward the purchase on one hearing aid, and \$1000 toward the cost of two hearing aids.
- H. DVR cannot require consumers who are SSI and/or SSDI beneficiaries to provide funding toward their services, including for hearing aids.
- I. DVR does not help with the cost of a hearing exams, fitting fees, or hearing aid follow-up fees.
- J. DVR authorization for payment may be processed in one of two ways:
 - 1. Mail the authorization with the consumer's contribution to the cost and a copy of the hearing aid recommendation showing consumer's choice. Bank checks are required by our vendors as it is a guarantee of payment.
 - 2. Should the consumer be a patient of a state hearing aid contract vendor/audiologist, the consumer can pay the vendor/audiologist directly and there is no need for DVR to get involved regarding the patient's method of payment.
- K. The consumer is expected to schedule their own audiology related appointments and arrange payment for all service fees with the audiologist. The consumer should be informed of this early in the process.
- L. All hearing aids have a 45-day trial period for the consumer to test them out. The counselor should note the 45-day trial period on the IPE (Individual Plan for Employment). The 45-day period starts on the day the consumer walks out of the fitting appointment wearing the aids. The counselor should follow up with the consumer and/or the audiologist on how the hearing aids are working out. In the event the consumer is not satisfied during this trial period, the hearing aids can be returned to the audiologist and their money will be refunded. The VR counselor can void the authorization and the hearing aid purchase can start over again. This is an important protection for consumers.

Guidance: – Replacement of hearing aids.

- DVR will not cover damage to hearing aids or provide replacements IPE within five years of purchase. Therefore, the consumer is strongly encouraged to obtain loss or damage coverage for the hearing aids.
 - ⊕ Information about coverage is available through hearing aid manufacturers, hearing aid providers, and audiology practices.
 - ⊕ Most hearing aid warranties run for up to three years, depending on make and model. The last two to four years would need to be addressed by adding the hearing aids to a homeowner's or renter's insurance policy and/or purchasing hearing aid insurance through a hearing aid insurance provider like Midwest Hearing Agency, <https://www.mwhi.com/>. DVR may provide financial support for the additional coverage based on consumer need.
- Standards for Exceptions:
 - ⊕ DVR may purchase replacement hearing aids in less than five years if the consumer experiences significant additional hearing loss and this is verified in writing by a certified clinical audiologist or licensed hearing aid dispenser in good standing with the State of Vermont.
 - ⊕ The VR counselor must consult with the DVR director or designee and document the exception in the case record.

End Guidance.