

Chapter 311: Post-Secondary Education and Training

Vermont Division of Vocational Rehabilitation
Policy and Procedures Manual

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Section I. 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. The OJT agreement must specifically outline the required training to be provided by the employer and the cost.
- B. **“Post-secondary training program”** means training that leads to an industry recognized credential or marketable skills needed by local employers.
- C. **“Pre-apprenticeship program”** means a program that teaches basic technical and job readiness skills in preparation to enter a Registered Apprenticeship Program.
- D. **“Progressive education and training”** means VT 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
- E. **“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.
- F. **“Supported education”** means providing intensive supports for individuals with disabilities to allow them to participate in post-secondary education programs.

Section II. 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 DVR consumers may have had negative education and training experiences in the past, and may initially be reluctant to consider these options. To address this issue, 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.
- D. Sections III through VIII of this chapter outline the spending guidelines for each program. However, the counselor may make an exception to spending guidelines with the Regional Manager’s approval under the following circumstances:

1. DVR cannot require consumers who are SSI or SSDI beneficiaries, to provide funding towards their services including post-secondary education and training. These consumers are still required to apply for financial aid as outlined in the guidelines. Also, SSI and SSDI beneficiaries may be able to use a Social Security Administration Plan to Achieve Self Support (PASS) to fund their post-secondary education or training. PASS can be a very effective tool to pay for all or part of a post-secondary program. The counselor and consumer should consult with a benefits counselor about PASS before proceeding.
2. The consumer is living in poverty and participation in the post-secondary program will likely result in an employment outcome that will provide a living wage.
3. Participation in the program will likely lead to an employment outcome that pays a wage that is significantly higher than the consumer has earned in the past.

Section III. 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 DVR 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), and 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. Programs such as the Community Kitchen, provide the DVR consumer the opportunity to develop skills that are clearly marketable to local employers.

Use of Assessment and Labor Market Information

- A. The DVR 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 aptitudes.
- B. The DVR 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

- A. The DVR 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.

Guidance — Post-secondary training spending guidelines.

- *DVR can provide funds for the tuition costs of post-secondary training programs leading to an industry recognized credential, up to a maximum of \$3,000 per case. Exceptions to this spending guideline require approval of the DVR Regional Manager.*
- *DVR can provide funding for the tuition costs of post-secondary training programs that do not lead to an industry recognized credential, up to a maximum of \$1,500 per case. Exceptions to this spending guideline require approval of the DVR Regional Manager.*
- *DVR recognizes that many consumers may require additional 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).*
- *The spending guideline for ancillary supports is up to \$2,000 per training based on consumer need. Exceptions to this spending guideline require approval of the DVR Regional Manager.*

End Guidance.

Section IV. On the Job Training Agreements

General Description

- A. An OJT is only allowable in a competitive employment setting when the DVR consumer is hired directly by the employer.
- B. An OJT is appropriate when a DVR 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 DVR consumer for 40 hours over a four-week period, that expense could be covered by DVR in an OJT agreement.

- C. OJTs must not be used as an incentive or wage subsidy for employers.

Establishing OJT Agreements with Employers

- A. If the DVR counselor and the employment team determine an OJT is required, an agreement must be developed with the employer. A template agreement is provided in Attachment (X).
- B. The OJT agreement must specifically outline the required training to be provided by the employer and the cost.
- C. The BAM and/or the Employment Consultant should negotiate the terms of the OJT 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.

Guidance – OJT spending guidelines.

The amount of funds provided in the OJT 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. The spending guideline for an OJT is up to \$3,000 per agreement. Exceptions to this spending guideline require approval of the DVR Regional Manager.

End Guidance.

Section V. 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

- A. 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..
- B. The consumer will earn a nationally recognized portable credential. 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).
- C. DVR will support consumer participation in RAPs approved by the Vermont Department of Labor.

Requirements for Pre-Apprenticeship Programs

- A. Pre-apprenticeship means a program that teaches basic technical and job readiness skills in preparation to enter a Registered Apprenticeship Program.
- B. A pre-apprenticeship program can take many forms. It can provide classroom training and hands-on labs related to an apprenticeship occupation. It can also include a paid work experience.
- C. 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.

Guidance – RAP and pre-apprenticeship spending guidelines.

- *DVR will provide up to \$1,000 for the related instruction for a pre-apprenticeship program per event. Exceptions to this spending guideline require approval of the DVR Regional Manager.*
- *DVR will provide up to \$3,000 for the related tuition for a RAP. Exceptions to this spending guideline require approval of the DVR Regional Manager.*
- ⊕ *In most cases, it will not be necessary to provide ancillary financial supports such as transportation, clothing, and maintenance costs, for DVR 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 VI. 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 should not be considered 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 DVR 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 DVR consumer must need additional vocational rehabilitation services beyond assistance with college expenses to be eligible for DVR services. To meet the basic eligibility for DVR services a consumer must require multiple services to achieve an employment goal. For example, a DVR applicant who requires assistive technology and job placement assistance in addition to a post-secondary degree, would be eligible for DVR services. A DVR applicant who is strictly seeking financial support for a post-secondary education program would not meet the eligibility requirements for DVR services (see Chapter 202, "Eligibility").
 2. Participation in the post-secondary education program is directly linked to the achievement of an employment outcome identified in the IPE. 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 education 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.

Counseling and Guidance

- A. 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 DVR consumer. As part of the counseling and guidance process, the DVR 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 to 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.
- B. 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

- A. The DVR counselor should have conversations with the consumer about expectations & intentions throughout their college experience. General expectations should include:
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)

Guidance – Post-secondary education spending guidelines.

- *As noted, DVR should not replace Pell or VSAC state grants as a general source of funding for tuition.. In fact, in many cases DVR funding for tuition can result in a dollar for dollar reduction in state financial aid provided. However, the counselor may consider funding other costs not covered by financial aid such as books or fees.*
- *The general rules determining when expenditures can be made for post-secondary education are as follows:*
 - ⊕ *The Division cannot pay for direct school costs of post-secondary education unless maximum efforts have been made by the Division and the individual to secure grant assistance in whole or in part from other sources to pay for that education.*

- ⊕ *Commitment of Division funds will not be made until a need has been confirmed. The grant award or denial statement must be reviewed to calculate the need, if any, for direct school costs.*
- ⊕ *The Division will not pay if the person has failed to meet applicable financial aid filing deadlines.*
- ⊕ *Childcare, transportation, and attendant care expenses are not direct school costs and will be considered separately*
- *For matriculated (degree) courses, the Division may furnish up to a maximum of \$600/semester for a full-time student, and up to a maximum of \$300/semester for a part-time student, toward direct school costs. However, the Division's share cannot offset, directly or indirectly, grants for which the person would otherwise be eligible.*
- *Exceptions to these spending guidelines require approval of the DVR Regional Manager.*

End Guidance.

Support for Out of State Programs

- A. 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.
- B. To receive DVR financial support the consumer must provide documentation that their permanent address remains in Vermont.

Support for Graduate Level Programs

- A. 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.

Section VII. Progressive Education and Training

- A. As noted in Section II. B., many DVR consumers have had negative experiences with education and training programs. Others may have no family history of post-secondary participation 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 DVR consumers by offering graduated opportunities for participants 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 VIII. 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, VR 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.*
- *VR 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 are primarily funded through the Developmental Disabilities Services Division (DDSD) Medicaid Global Commitment funding. DVR will provide financial support consistent with Section VI. 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, DVR will provide up to \$600 per semester for books and supplies.*
- ⊕ *For students participating in supported education programs who are not receiving DDSD Medicaid Global Commitment funds, DVR can provide up to \$1,500 for the school year 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 counselor may provide additional funding for books, transportation, and other expenses consistent with Section VI. spending guidelines.*
- *Exceptions to these spending guidelines require approval of the DVR Regional Manager.*

End Guidance.