

# TRAINING

## ***GENERAL GUIDELINES***

These guidelines apply to all types of training including: college, technical, proprietary, correspondence, short-term, etc.

Training may be provided when needed to assist an eligible individual achieve the agreed upon career goal.

Informed choice regarding training results from the combination of the expressed wishes of the consumer and the professional expertise of the counselor to insure that optimum benefit will be realized **in terms of employment outcome** by the expenditure of time and resources of both the consumer and the Department.

Prior to the provision of training:

- The counselor should assist the consumer in thorough career exploration. The counselor should encourage the potential student to complete interest inventories, visit job sites and training institutions, participate in shadowing and volunteer opportunities, etc., as appropriate, to help the individual fully understand the career choices available. Tools such as O-Net (Dictionary of Occupational Titles) and the Occupation Outlook Handbook are valuable resources for information on training requirements, salary ranges, and working conditions of many occupations. The counselor should explain to the consumer about labor market trends and the probable availability of employment in the planned occupation after completion of training.
- The counselor should thoroughly assess the individual's transferable skills, interests, and capacities to determine whether training is necessary for appropriate employment consistent with the consumer's potential.
- Documentation in the case file should support the counselor's conclusion that the individual has the ability, aptitude, and interest to complete the training and obtain the certification or degree required for employment, with or without reasonable accommodations. This evidence may include various performance measures such as academic records, ACT or TABE scores; or psychological testing. If adequate existing information is available to support the probability of success, psychological testing is not required.
- The counselor should carefully discuss with the consumer all situations, obligations, history, and attendant factors which may impact successful completion of training and explore comparable training options prior to finalizing a plan for provision of training.

When other forms of assessment are not indicative of the individual's likelihood of success in training, a semester of training may be an appropriate assessment tool. It is important to note, however, that a semester of training sponsored by the Department

should not be routinely used as an assessment. When it appears that remediation may be necessary to insure success, the counselor should introduce the consumer to programs to increase skills ( i.e. adult education, etc.) prior to Department sponsorship of training.

Students are expected to be ready to successfully participate in required coursework prior to beginning training. Adult education courses should be utilized to increase skills when appropriate to the needs of the individual and geographically available. Because of the availability of remedial educational assistance at no charge to the Department, it is expected practice that counselors will authorize for no more than one non-credit course throughout the course of the student's training. It is expected that this course will be taken during the first year of training only. Any additional non-credit courses are the responsibility of the consumer. Exceptions to expected practice must be thoroughly justified and documented in the case record.

The goal of DVR sponsored training is not edification but employment. Progress should be monitored carefully and due diligence should be exercised to insure that all efforts are directed toward the achievement of an appropriate positive employment outcome.

Assistance with tuition and fees is to be determined by applying the sliding scale and comparable benefits according to the process that has been adopted for paying tuition. Counselors should keep in mind that tuition assistance provided by the Department shall not exceed the rate of the highest state supported school that offers similar vocational preparation.

The Department may provide tuition and fees at post-secondary programs for individuals who are deaf recognized by the U.S. Congress as national programs (i.e. Gallaudet, NTID). The cost of these services can be calculated without regard to financial needs testing or comparison with cost of tuition, fees and related expenses at a state-supported institution. As always, comparable benefits must be considered.

Training that is not offered by state-supported training institutions may be provided at the published rate of the chosen institution after applying the sliding scale and appropriate comparable benefits.

Institutional training must be purchased only from those schools that are accredited or licensed by appropriate accrediting or licensing bodies and who comply with all state and federal requirements applicable to their use by the Department. Maximum utilization will be made of public and other vocational or technical training facilities or other appropriate community services.

Prior to the beginning of training the counselor and student are to negotiate the individualized minimum requirements for successful progress in training. The agreed upon requirements should include at a minimum: expected grade point average; minimum number of credit hours to be completed per term; requirements for filing financial aid forms; responsibility to contact counselor prior to changes in plan; responsibility for provision of grade or progress reports at the conclusion of each term; and anticipated date for completion of training. These requirements may be

recorded on the IPE or on a separate document but must be signed and dated by the consumer to indicate agreement with the requirements.

As a general guideline, it is expected practice that training programs in which a consumer is enrolled fulltime will be completed as follows:

<u><b>Program</b></u>	<u><b>Maximum Expected Duration of Training</b></u>
Two year associates/ technical college	Three (3) years
Four year bachelor degree	Five (5) years

When additional time beyond the expected maximum is required, the justification for the extension and the revised expected completion date are to be clearly documented in the case record.

It is expected practice that counselor and student will meet at least once annually to review progress and make needed changes to the plan. The counselor can take this opportunity to discuss: the individual's progress by reviewing grades and class schedule; explore the impact of the disability on success in training; identify needed accommodations or changes to the plan; or make appropriate referrals.

It is expected practice that students will maintain full-time training status and will make satisfactory progress toward the completion of training. Exceptions should be made by the counselor when part-time training is necessary due to the limitations of the disability or would result in financial savings to the Department (i.e. student only requires one class to graduate).

It is expected practice that students will maintain at least a "C" average throughout the training program. At the counselor's discretion, sponsorship may continue when this requirement is not met for **one additional term** only. The justification for exceptions to this expected practice must be clearly documented in the case record. The counselor may require a higher grade point average if such is necessary for satisfactory achievement of the vocational objective. Individuals are required to furnish the counselor with a grade transcript or progress report for each grading period.

Books and supplies are excluded from financial needs testing. Books and supplies purchased for the student will be limited to those considered essential. Books may be sold by the student and receipts can be used to purchase books and supplies for the upcoming semester.

Comparable benefits are to be considered for colleges, universities, junior colleges, community colleges, technical colleges, business schools, and other post-secondary institutions.

## STUDENT NEED AND AID ASSESSMENT

Individuals who plan to attend a training program that participates in a financial aid program must file the FAFSA (Free Application for Federal Student Aid) at least once. If the student is not eligible for need-based financial aid and dependency status, income, and/or school has *not* changed, students are not required to reapply for financial aid on a yearly basis. Students must also apply for other school specific financial aid assistance or other sources of grants that are available. Failure to seek out and utilize comparable benefits may result in the cessation of Department sponsorship of the training.

Financial assistance for school tuition and fees is based on individual economic need *after* the application of comparable benefits. A sliding scale, based on adjusted gross family income, will be applied to determine the amount of tuition assistance that will be paid by the Department. The amount of DVR tuition assistance is determined by filling out the Training Expenditure Worksheet. This worksheet is a tool to plan training services. It is to be completed yearly for **all** training cases including short-term training, continuing education, college, graduate school, and training institutions where financial aid is not available. Disability related services are to be addressed throughout the rehabilitation process on the IPE and are not to be included on the form.

For institutions that participate in a financial aid program, the Student Aid Report (SAR) is to be used to complete the Training Expenditure Worksheet. For those programs that do not participate in a financial aid program, information from the individual's most recent tax return or the reported household income from the DVR Application may be used to complete the form.

Appropriate comparable benefits must be explored and utilized as outlined in Federal and State regulations and Department policy. Negotiation is strongly encouraged to maximize resources to successfully serve the greatest number of eligible individuals.

### Exceptions To Tuition Payment Process

#### *Exception to Requirement for SAR*

A SAR is required for all training cases attending institutions that participate in financial aid. A SAR is **not** required for individuals attending institutions that do not participate in a financial aid program. If the individual files the FAFSA and is not eligible for any need-based financial aid (including grants or loans), a new SAR is not required in subsequent training years if there has been no substantive change in family income, dependency status, or school of attendance. The initial SAR should be used to complete the form.

#### *Exception to Sliding Scale*

Tuition and initial registration fees may be provided at post-secondary programs for individuals who are deaf that are recognized by the United States Congress as national programs without regard to financial needs testing. One hundred percent of tuition may be paid to these institutions.

Financial needs testing is **not** to be applied to tuition and initial registration fees provided to individuals who receive SSI or SSDI as a result of their disability. One hundred percent of tuition and fees after the application of comparable benefits is to be paid.

### ***Exceptions to Highest State Rate***

Tuition and initial registration fees may be provided at post-secondary programs for individuals who are deaf recognized by the United States Congress as national programs without limitation to highest state rate. Enter actual amount of tuition.

Training that is not available through state-supported training institutions may be provided at the published catalog rate of the institution.

### ***Default on Loans***

If the student has made a “good faith effort” to resolve the situation, then it will be up to counselor discretion to provide tuition assistance per the sliding scale. Examples of a “good faith effort” could include contacting the financial aid office to make arrangements for payment, getting the loan put into a deferred status, corresponding with the collection agency, etc. This “good faith effort” should be documented in the case.

### ***Replacing Loans***

Students are expected to participate in the cost of their training according to the application of the sliding scale. Subsidized loans may be replaced up to the allowable amount that the Department can pay after applying the sliding scale. The student is responsible for the percentage not covered by Department sponsorship and may be required to take out loans if other sources of aid are not available. The Financial Aid Office should be notified regarding replacement of loans.

## **TYPES OF TRAINING**

### **Summer School**

It is expected practice that summer school will be provided when the course is relevant to the individual’s vocational objective, and one or more of the following conditions are present:

- The summer course reduces the length of time that the consumer is enrolled in school, by at least one term, and/or reduce cost to the Department.

- The lack of the summer course will result in a conflict with the regular session.
- The required course will not be offered at any other time than the summer session.

Exceptions to expected practice are to be justified and thoroughly documented in the case record.

### **Graduate Training**

Graduate training is to be planned when it is clearly required to meet the original vocational objective (i.e. physician, attorney, dentist, etc.). The field administrator does **not** have to approve graduate training when it is required to meet the original objective. When a rehabilitation plan is nearing completion and the individual has made satisfactory progress, the objective should not be changed in order to receive graduate assistance or other advanced training. Any program or amended program to provide graduate training which is not clearly a requirement for the original objective must be reviewed for: (1) the appropriateness of the vocational objective as it relates to the disability; (2) other vocational objectives that should be considered for the individual that do not require advanced training; and (3) the determination of the necessary level of training for the vocational objective. Approval of the field administrator **is** required.

Assistance with any tuition and fees is determined by applying the sliding scale and appropriate comparable benefits according the process that has been adopted for paying tuition. Counselors should keep in mind that tuition assistance offered by the Department must not exceed the highest rate of a state-supported school that offers similar vocational preparation.

### **Correspondence/Technology Assisted Training**

The Department may authorize the provision of correspondence or technology assisted training (i.e. web-based, distance learning, interactive, etc) to an eligible individual if it is the best method by which the individual may receive the necessary training. Providers of such training must be accredited or licensed by the appropriate body and comply with all state and federal requirements applicable to their use by the Department. The Department should not sponsor correspondence courses in subjects such as heavy equipment operation, truck driving, depot agent, detective or airline employees if practical experience is not provided.

Assistance with any tuition and fees is determined by applying the sliding scale according the process that has been adopted for paying tuition. Counselors should keep in mind that tuition assistance offered by the Department must not exceed the highest rate of a state-supported school that offers similar vocational preparation.

## **Other Training Programs**

Consumers may choose to participate in other types of training such as corporate training, proprietary training, or continuing education classes. DVR can support these types of training in the same manner as other post-secondary training. Assistance with any tuition and fees is determined by applying the sliding scale and appropriate comparable benefits according to the process that has been adopted for paying tuition. Counselors should keep in mind that tuition assistance offered by the Department must not exceed the highest state-supported school that offers similar vocational preparation.

## **Training Outside The United States**

It is expected practice that training will be provided at institutions located within the United States. Exceptions may be considered if all of the following conditions are met:

- Individuals are enrolled in a program in the United States that requires study abroad to satisfy degree requirements for graduation;
- The study abroad does not lengthen the total program;
- Individuals maintain full-time student status while studying abroad;
- Individuals are in good academic standing; and
- Successful achievement of the vocational goal is contingent on participation in the study abroad as a part of the approved curriculum.

If all five (5) of the above conditions are met, the Department may make an exception and provide financial assistance only up to the amount normally authorized for the individual's training in the United States, excluding transportation costs. The sliding scale and appropriate comparable benefits are to be applied. Approval by the Field Administrator and Director of Program Services or designee is required before training outside of the United States can be provided.

## **EDUCATIONAL SUPPORT SERVICES**

### **Tutorial Services**

A tutor is an individual charged with the instruction of an individual, usually one-on-one, in a particular subject or skill. For the purpose of this manual remediation, disability –related tutoring, and content tutoring have distinct definitions.

*Remediation* - Tutoring or classes aimed at addressing deficiencies in basic education which are not caused by limitations or impact of a disability or disabilities. Adult education courses should be utilized to increase skills when appropriate to the needs of the individual and geographically available.

*Disability-related tutoring* – tutoring, classes, or programs designed to specifically compensate or circumvent limitations or impact of a disability or disabilities on academic or educational attainment. Examples of disability-related tutoring are Learning Disability Programs, Deaf Tracks, etc. Some institutions may refer to programs that meet this definition as remediation, therapy, or mentoring that is designed to address disability issues. Counselors may purchase disability-related tutoring at the established fees set by the Department when the service is appropriate to address the limitations of the disability.

*Content tutoring* – tutoring aimed at addressing poor academic progress in a specific class or course that is not caused or impacted by a disability.

Non-credit remediation programs and content tutoring opportunities that are commonly provided at many institutions may not be the most appropriate source of assistance for many consumers with disabilities. For example, remediation or content tutoring in mathematics may be ineffective for an individual with a mathematics learning disorder. Counselors should become aware of community resources that provide disability-related tutoring and provide information to the student so the most appropriate and beneficial services can be provided. Many training institutions have Disability Resource Centers or Special Student Services that can provide the counselor and student information on assistance available to students with disabilities at that institution.

### **Educational Aid Services**

Services such as page turning, typing, recording, reading, and securing reference materials, etc. may be provided and are considered educational assistance or aids. Individuals performing such duties are education aides. The hourly rate for such services is the same whether the services are conducted for an individual or for a group.

State law provides for funding to Kentucky public postsecondary institutions for auxiliary aids, such as interpreters and notetakers in the classrooms for students who are deaf or hard of hearing. This program is funded for public postsecondary institutions only. The Department oversees the administration and distribution of this fund. However, the public postsecondary institutions, **not the Department**, are ultimately responsible for arranging and providing communication access to these students. The public postsecondary institutions are reimbursed by the Department through the Deaf and Hard of Hearing Services Branch for their classroom interpreter and notetaker expenses. For Department consumers who are deaf or hard of hearing, interpreter and notetaker costs are tracked utilizing the EP-8-3 form. Expenses for individuals who are not consumers are paid from a separate budget.

Interpreter and notetaker costs are negotiated with Kentucky private postsecondary institutions when eligible consumers who are deaf or hard of hearing attend these programs. Current Department practice is to share half of the cost of these services with the Kentucky private postsecondary institution.



## **OTHER TRAINING ISSUES**

### **DVR Assistance With Repeated Training/Multiple Training Programs**

Prior to providing Department assistance with repeated training programs, a thorough job search and/or assessment of transferable skills should be conducted as the availability of employment at the current skill level should be ruled out. If a consumer has completed a training program that has enabled or will enable him/her to achieve a positive employment outcome with the current level of training, it is not the responsibility of the Department to continue to provide assistance with additional training programs that may broaden employment opportunities or enhance advancement opportunities. For example in the rapidly changing computer technical field, frequent retraining is the norm not the exception. Many employers provide employee retraining opportunities.