Post-Secondary Services
Training Objectives

VR Counselor Responsibilities
Review of Post-Secondary VR Promulgated Rules
Financial Aid Communication (FAC)/Higher Education Calculator Examples
Notice of Determination Letter
In the beginning...

The process of addressing post secondary services begins at intake, is visited again during the comprehensive assessment and continues with periodic reminders and consultation throughout the life of the case.
Caseload VR Counselor Responsibilities:

Ensures post secondary training is appropriate for the consumer*

- Does the consumer possess the cognitive and academic ability to succeed in a post secondary arena?
- Does the consumer have the financial resources to sustain themselves for the duration of the training?
- Does the consumer have all necessary supports in place to successfully participate in training (e.g., transportation, adaptive equipment, mental health services etc.)

* Justification of same is entered into case notes
Caseload VR Counselor Responsibilities:

Ensures post secondary training is necessary for the attainment of the vocational goal (i.e., vocational research)*:

- Tools that can assist along these lines:
  - Career Index (http://www.thecareerindex.com)
  - Career Connect (https://www.indianacareerconnect.com)
  - O*Net (http://www.onetonline.org)
  - Vocational Goal Research Guide (Consumer Homework)

- In addition to other comprehensive assessment points; vocational research should uncover answers to these specific post-secondary training questions:
  - What specific training or degree meets the vocational rehabilitation need?
  - What academic institutions offer the necessary training?

* Justification of same is entered into case notes
Caseload VR Counselor Responsibilities:

Ensures a thorough conversation has taken place with the consumer that covers*:

- Requirement to file the Free Application for Federal Student Aid (FAFSA) (https://fafsa.ed.gov/)
- Explanation of Post-Secondary annual fee schedule Memorandum
- Timing of and how VR utilizes the Financial Aid Communication (FAC) form & Higher Education Calculator (HEC) to determine direct educational expense(s) funding amounts (i.e., Authorization Limit)
- The following terms: least cost, local in-state, non-local in-state, private, out-of-state and how these options can affect the authorization limit and the provision of support services (e.g., attendant care, note taker etc.)

*Justification of same is entered into case notes
Caseload VR Counselor Responsibilities:

Ensures a thorough conversation has taken place with the consumer that covers (cont.):

◦ Explanation of what & how transportation expense are determined
◦ Consumer’s responsibility to submit course of study
◦ Consumer’s responsibility to submit course registration at the beginning of each term
◦ Consumer’s responsibility to submit grades at the end of each term
The VR program shall be the **last-dollar funding source** after the expected family contribution and all comparable benefits, including federal, state, institutional, and private financial aid grants, scholarships, and other gift awards, have been explored and utilized. *Comparable benefits do not include awards and scholarships based on merit.*

**460 IAC 14-18-1(b)**

*Student loans are not to be considered as a funding source when determining VR financial assistance with Post-Secondary Education.*
An eligible individual must attend the lowest cost provider for the eligible individual's postsecondary education that meets his or her vocational rehabilitation needs and is appropriate to the employment outcome specified in the eligible individual's IPE.

460 IAC 14-18-3(a)
Financial Requirements – Lowest Cost Exceptions

An eligible individual may attend a postsecondary education institution or program other than the lowest cost provider if:

(1) another institution of the eligible individual's informed choice offers a comparable program at a cost equal to the lowest cost provider;

or

(2) the individual agrees to pay all additional costs that exceed those costs of the lowest cost provider.

460 IAC 14-18-3(b)
Financial Guidance – Lowest Cost Defined

The VR program may pay the lesser of the following documented postsecondary education expenses:

(1) The published fees and tuition costs of the training institution or program attended.

(2) The fees established by the VR program.

The VR program shall pay for postsecondary education for only one (1) term or semester or quarter at a time, as applicable.

460 IAC 14-18-4(a)
Financial Guidance – Room & Board

The VR program may pay for room and board expenses, not to exceed the amount documented:

(1) for institutional room and board; or

(2) for private housing other than the individual's own residence.

The VR program shall not pay for housing or meal assistance for any eligible individual who does not incur additional room and board expenses for his or her postsecondary education.

460 IAC 14-18-4(b)
Financial Guidance – Books & Materials

The VR program may pay for the costs of books, tools, and other training materials required for courses in which the eligible individual is enrolled, including a personal computer, hardware, software, or services that are necessary for the eligible individual's postsecondary education and vocational rehabilitation needs.

The VR program shall not pay for books, tools, or other training materials that are not required by published course descriptions or syllabuses.

460 IAC 14-18-4(c)
The VR program may pay for the care of a dependent minor or an aging or a disabled family member only if the eligible individual is the sole or primary caregiver and alternative dependent care is not available.

460 IAC 14-18-4(d)
Financial Guidance – Personal Expenses

The VR program shall not pay for personal expenses if the eligible individual's expected family contribution, grants, or other financial aid resources are available to meet the additional personal expenses to the eligible individual's associated postsecondary education.

460 IAC 14-18-4(e)
Financial Guidance - Transportation

In the case of an eligible individual who is a commuting student, the VR program may pay for transportation expenses for no more than one (1) round trip between the individual's place of residence and the institution, per day commuted.

460 IAC 14-18-5(a)
The maximum dollar amount paid for transportation expenses shall not exceed the actual cost of transportation based on either:

(1) a published public transportation fare schedule; or

(2) the Financial Management Circular #2014-01 published by the Indiana state budget agency.

460 IAC 14-18-5(b)
Financial Guidance - Transportation

The VR program may not pay transportation expenses if the expected family contribution, grant assistance, or other financial aid resources are sufficient to cover these expenses.

460 IAC 14-18-5(e)

In practice, transportation costs are figured into the increased cost of attendance on the Higher Education Calculator. If the EFC and/or other financial aid awards do not cover the costs of those transportation costs, VR may reimburse the consumer for mileage incurred, providing that the consumer submits a Reimbursement Statement (form in IRIS) documenting commute dates for the period (may be submitted monthly or per academic period). The shortest distance to/from school should have already been identified by the VR Counselor.
Financial Guidance – Expected Family Contribution

An eligible individual shall determine and pay for his or her *Expected Family Contribution* (EFC).

The VR program shall not pay for any portion of the eligible individual's expected family contribution.*

460 IAC 14-18-7(a) and (b)

*The EFC is determined based on the information submitted on the FAFSA application. VR does not have any role in determining the EFC.*

*Exception: The EFC is disregarded if a student receives Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) based upon their own disability.*
Specific Limitations – Repeat Courses

The VR program may not pay for required courses that must be repeated because the eligible individual failed, the eligible individual dropped the course after the institution or program's deadline to withdraw from the course, or any other reason that is the fault of the eligible individual except for required courses that must be repeated if:

(1) the failing grade or withdrawal was due to circumstances beyond the eligible individual's control, which resulted in the eligible individual's inability to successfully complete the course; and

(2) the eligible individual notified his or her counselor of the eligible individual's inability to successfully complete the eligible individual's required course work.

460 IAC 14-18-8(a)
460 IAC 14-18-8(b)
Specific Limitations – Elective Courses

The VR program may pay the costs associated with elective courses needed to complete a degree program.

For elective courses outside the prescribed coursework, the VR program may pay the costs of tuition and books only. The VR program may not pay the costs of course-specific fees, specialized tools, and other training materials, or the costs of related tutoring services.

460 IAC 14-18-9(a) and (b)
Specific Limitations – Summer School

The VR program may pay for assistance for summer school on a case-by-case basis.
Specific Limitations – Remedial Courses

The VR program may pay for remedial courses if:

(1) remedial courses are required or recommended by the postsecondary education institution or program for the eligible individual; or

(2) the counselor has determined that the eligible individual has demonstrated satisfactory progress toward achievement of his or her employment outcome.

460 IAC 14-18-13
Specific Limitations – Graduate/Post-Graduate Studies

The VR program may pay for graduate or postgraduate studies if an advanced degree is the minimum qualification required to achieve the eligible individual's approved employment outcome.

460 IAC 14-18-11
A Word About Lap Tops & Other Technology

When does VR purchase lap tops or other Technology Equipment:

When VR can:

If there is a disability related need for a lap top or computer outright or one is needed to run adaptive disability related equipment/software and consumer does not have their own computer they can utilize to do so and the training institution does not provide the necessary academic accommodation technology equipment the consumer requires.

Either the training institution or the specific program requires it of all students (this requirement should be documented in institutional and/or program description material) and the consumer does not have their own computer. In this case, the item should be noted on the FAC along with its cost so that the cost for this item can be considered within the calculation of the Authorization Limit Amount.
A Word About Lap Tops & Other Technology

When does VR purchase lap tops or other Technology Equipment:

When VR can’t:

When it is a convenience only matter for the student.

When the training institution offers computer labs and equipment that will meet the need of the consumer.

When the student has their own computer that is appropriate for the need.
VR Post-Secondary Funding Process

Financial Aid Communication (FAC)/Higher Education Calculator (HEC)
Annual FAFSA Notification Requirement

The VR Counselor will be deemed to have made the maximum efforts required...if he or she has informed the consumer annually by counseling and guidance regarding the student financial aid application requirement...using appropriate modes of communication applicable to the consumer.

34 CFR 361.48(f); sub-regulatory federal policy, RSA-PD-92-02 (Nov. 21, 1991]
Financial Aid Communication (FAC)/Higher Education Calculator (HEC)

Financial Aid Communication (FAC) form is used to communicate the consumer’s Financial Aid budget to the VR Counselor.

The Higher Education Calculator (HEC) is a tool to help the VR Counselor determine the amount of financial assistance, if any, which VR can provide to the consumer for direct educational postsecondary expenses (updated for every academic year and summer school).
Financial Aid Communication Form (FAC)

Protocol for Processing Regular Academic Year

- Blank FAC is sent to consumer (January/early February)
  - Consumer completes part A and sends FAC to VRC
- FAC with part A completed is sent to Financial Aid Office for completion of part B (June/July)
- FAC with part B completed is received from Financial Aid Office (FAO) (July/August)
- VRC or VRCC contacts FAO to clarify amounts and obtain specifics with regard to noted resources
- VRC completes Higher Education Calculator (HEC)
- Notice of Determination letter is sent to student
Financial Aid Communication Form (FAC)

Reach out to Financial Aid Office
- Confirm amounts noted on FAC
- Clarify specifics of “Other Grants and Scholarships”
  - Is it school specific?
  - Is it to be used for a specific cost category?
  - Is it merit based AND cost category specific?
  - Is it merit based and NOT cost category specific?
  - Is it a loan or grant?
Financial Aid Communication Form (FAC)

The Financial Aid Communication form (FAC), is used to capture for each academic period (quarter, semester, year, etc.):

- Ensure the Student’s program or major study area coincide with planned employment outcome
- the number of credit hours for which the consumer is registered for the academic period;
- dates of the academic period for which information is included on the form
- Date the FAFSA was filed per FAO
- the costs for the academic period;
- the EFC (if any); and
- any scholarships or grants awarded.
Financial Aid Communication (FAC)/Higher Education Calculator (HEC)

Things to Consider

School Specific Aid – This aid is provided by more expensive schools to offset the additional costs of attendance at their school and as such these funds would not be available to the student at another school.

School Specific Aid is not directly added to the Higher Education Calculator; but rather it is deducted from the designated cost category (e.g., tuition, books etc.) before that designated cost category amount is put into the Higher Education Calculator.

(VRCs should indicate in the HEC comments section when they have done this)
Financial Aid Communication (FAC)/Higher Education Calculator (HEC)

Things to Consider

Merit Scholarships
Scholarships awarded based on merit **AND** not specified as to use (meaning the consumer can utilize as they so choose) are not considered comparable services and are not listed as a resource on the Higher Education Calculator.
Financial Aid Communication (FAC)/Higher Education Calculator (HEC)

Things to Consider
State Financial Aid—This type of aid is available at most State colleges, is designated for tuition/fees only and is transferable from one state college to another state college.

• Indiana Commission for Higher Education
  http://www.in.gov/che/

• State Financial Aid is added directly to the Higher Education Calculator in the Resources column, in the State Aid box.
Financial Aid Communication (FAC)/Higher Education Calculator (HEC)

Things to Consider

Student Loans – This type of aid is not considered a comparable benefit and should not be included on the Higher Education Calculator.

Federal Work Study - This type of aid is not considered a comparable benefit and should not be included on the Higher Education Calculator.
Things to Consider

All expenses added to the Higher Education Calculator must be considered in light of what is vocationally necessary AND what results in the least cost to the agency.

Example: If training is available locally (regardless of where consumer is attending school); Room and Board expenses are not added to the Higher Education Calculator (HEC)

Example: If training is available locally and consumer chooses to attend school away from home and as a result incurs additional Attendant Care expenses above what would have been incurred had the consumer chosen to attend school locally; VR will authorize only for the Attendant Care expense that would have been incurred had the consumer chosen to attend school locally.
Notice of Determination

Notice of Determination letter is sent to each student after the funding determination is made

- Three Notice of Determination letter templates
  - No Unmet Need
  - Unmet Need
  - Out-of-State
Notes for Notice of Determination Templates

Three Post-Secondary Determination templates (Unmet Need, No Unmet Need & Out-of-State) have been developed to assist staff in communicating post-secondary funding decisions to VR participants.

The templates include information that at a minimum needs to be communicated to each participant when post-secondary funding decisions are made.

The templates should be used going forward to notify VR participants of post-secondary funding determinations; the FAC & HEC do not need to be sent to the participant unless specifically requested to do so.

Staff should fill in the yellow highlighted sections of the template document.

Yellow highlights should be removed before mailing the document to the participant.

Staff should feel free to add additional language or additional lines to the Funding Determination chart (e.g., child care, transportation etc.) when necessary to provide clarity for individual situations.

Staff should read each letter before it goes out to ensure the notification makes sense for the individual situation and to ensure correct grammar has been used.

A copy of the VR appeal form should accompany each Determination letter

A copy of the letter should be imported into the participant’s IRIS file.

Once a Determination letter has been written staff can feel free to send it to Kian Hoss (Kian.Hoss@fssa.IN.gov) at FSSA Legal for review prior to sending the letter to the participant.
Case Examples Using FAC & HEC