

*DEPARTMENT OF LABOR AND INDUSTRY
OFFICE OF VOCATIONAL REHABILITATION
BUREAU OF PROGRAM OPERATIONS
BUREAU OF BLINDNESS AND VISUAL SERVICES*

PROGRAM POLICIES AND GUIDELINES

SUBJECT: 01-200.01 – TRAINING (Addendum Number 1)

Date: January 22, 2002

ADDRESSEES: OVR Staff
State Board of Vocational Rehabilitation
State Rehabilitation Council
Client Assistance Program
Statewide Independent Living Council
Advisory Committee for People who are Deaf and Hard of Hearing
Multicultural Advisory Committee
Advisory Committee for the Blind
OVR Legal Counsel
PA Coalition of Citizens with Disabilities
PA Association of Rehabilitation Facilities
National Federation of the Blind of PA
PA Council of the Blind
PA Association for the Blind

Identifiers: State Board of Vocational Rehabilitation

Effective Date: Upon receipt

Resulting Action: Correction to Number Memo 01-200.01 dated 9/14/2001

Inquiries: Bruce McClintick – (717) 787-5476

CITATION IN LAW: 34CFR361.50, and Pennsylvania Rehabilitation Act

The State Board of Vocational Rehabilitation develops and maintains written policies covering the nature and scope of vocational rehabilitation services.

MAJOR CHANGE: Imposition of the new cost maximum for Business, Trade and Technical training (BTT) is for customers beginning coursework in a BTT training program on or after August 1, 2001. Customers having begun a BTT training program prior to August 1, 2001, are continued to the conclusion of the program using the previous cost maximum, provided the program is continued to its logical conclusion without interruption. In the event of an interruption, the new cost maximum applies to future BTT programming.

OVERVIEW

Training services provided by the Office of Vocational Rehabilitation (OVR) are a means to achieving a suitable vocational objective selected by the customer and approved by the counselor. Training is funded according to OVR policy, regardless of where the service is provided. Before providing training at an out-of-state facility, verify with that state vocational rehabilitation agency that the facility has appropriate state accreditations.

The State Board of Vocational Rehabilitation approved all cost maximums for customers receiving training. The Board has also approved use of the congressional methodology to determine payment calculations for college training.

- College training includes any program offered by an accredited college or university that results in the awarding of an associate's, bachelor's, master's, doctoral, law, or medical degree.
- Business, trade, and technical training (hereafter referred to as BTT) includes any program offered in facilities approved by the Department of Education (business and trade) or Department of State (cosmetology and barber) that results in the awarding of a certificate, diploma, or Associate Degree. It includes courses offered by vocational schools, hospitals and other approved training providers. The Pennsylvania Directory of Private Licensed and Registered Schools is used for guidance.
- Nontraditional training includes correspondence, distant learning, or other non-traditional methods of training. It should be used only after studying other options and concluding it is the best alternative.

GUIDELINES, GENERAL

- OVR encourages customers to maintain full-time matriculation. Customers shall carry and receive credit for a sufficient number of credits/hours each semester/term in order to be graduated within the time limits established at the school. Exceptions may be made if a customer's functional limitations warrant; however, part-time attendance should be time-limited with the expectation that the customer will work up to full-time matriculation within one academic year.
- OVR customers shall maintain at least a "C" cumulative average. Customers shall maintain a higher average if required by the school or course major. OVR may terminate financial aid for customers with grades below these grade requirements. Exceptions may be granted if warranted by individual circumstances. End-of-term/End-of-semester grades are to be used to calculate the average.
- OVR customers may attend summer school if it will allow them to graduate earlier or if course work is unavailable at any other time. The customer shall provide evidence of these circumstances.

- OVR will not pay additional costs for courses being repeated.
- Training shall be authorized only to schools in the United States. However, foreign study may be authorized if it is part of the student's curriculum and it involves no additional time or costs above those normally anticipated.
- Out of state training may not be provided at a cost that exceeds similar services available in Pennsylvania.
- Customers who are in their first year of OVR sponsorship will not be penalized for a late Free Application for Federal Student Aid (FAFSA) application. Customers beyond their first year of OVR sponsorship, however, will have an estimated PHEAA grant amount used in their OVR financial needs formula even though the grant will be denied due to a late FAFSA application. The FAA can provide the estimated PHEAA amount. That amount will be entered into the OVR formula as if the customer had actually received the grants.
- Students in default status must produce written evidence from the Plaintiff Organization that they have attempted to resolve their default status before OVR can provide them with any OVR financial assistance for training. As long as such an attempt is in evidence, the customer will not be penalized even if the default is not resolved. If a customer does, however, agree to repayments terms, they must not default on such repayments. OVR financial assistance may be resumed after the customer has made six consecutive monthly payments prior to the start of the training.
- PHEAA defines an academic year as:
 - 30 weeks, or
 - 24 semester or trimester hours, or 36 quarter hours, or
 - 900 clock hours
- OVR customers may not be required to seek merit scholarships; however, if the customer receives a merit scholarship, the FAA in the unmet need computation will use it.
- District Administrators and District Managers may grant waivers above the OVR maximum only for demonstrated good cause. The customer may not receive any funds which exceed the actual costs of tuition, fees, books and supplies, room and board for dormitory students or transportation for commuter students. An OVR-133, Training Waiver Report, must be completed and maintained in the casefile. Customers shall apply for subsidized loans prior to consideration for waiver.
- District Administrators and District Managers set room and board charges, establish transportation reimbursement rates, and otherwise determine appropriate maintenance and commuting costs based on reasonable charges in the area. Commuting costs may not exceed the cost of room and board. Transportation reimbursement rates may not exceed the current rate for Commonwealth employees.

COLLEGE TRAINING

OVR customers shall apply for PHEAA and PELL grants. OVR will not provide financial aid to customers who fail to submit a FAFSA application. The Financial Aid Administrator (FAA) determines the student's unmet need using the congressional methodology.

FAFSA AND COST DETERMINATION

1. Advise customers to complete the FAFSA application as soon as possible. Some schools may require an additional form be filed if they do not utilize FAFSA services. In order for a student to receive a PHEAA grant for summer school, he/she must complete a separate summer school FAFSA application; however, the student must have completed a FAFSA application for the regular academic school year (preceding or upcoming) for the FAA to be able to provide the financial needs analysis for summer school.
2. The originating counselor forwards to the supervising counselor a completed Request for Financial Aid Information (RFAI), OVR-169 form. For continuing students, the supervising counselor completes the RFAI form.
3. A separate RFAI form and a separate determination of unmet needs must be completed for summer school. On the top, indicate "summer school" and the number of credits the student plans to take. The FAA will provide the cost of attendance, family contribution, estimated PHEAA grant (only available to full-time summer students if graduating in the next two terms/semesters), PELL grant, other grants and scholarships, and the PHEAA maximum gift aid amount.
4. The OVR supervising counselor includes his/her name and address on the OVR-169 and sends it to the appropriate FAA as soon as possible, but at least sixty days prior to the school starting date.
5. The FAA completes the financial portion of the form, or submits the requested information via printout or institutional form, and returns it to the supervising counselor.
6. Following receipt of the information, the supervising counselor calculates the OVR financial aid maximum and forwards a copy (including the cost of attendance, family contribution, PHEAA, PELL, OVR unmet need) to the originating counselor.
7. The supervising counselor prepares the authorization.

FINANCIAL NEEDS TEST

For customers receiving financial aid for college training, it is necessary to complete an OVR Financial Needs Test (OVR-105) only if the customer needs services other than college training; for example, physical restoration. In those instances, the family contribution towards training shall be applied to and deducted from any FNT contribution calculated on the OVR-105.

PAYMENT CALCULATIONS

The maximum amount Pennsylvania OVR/BBVS shall provide a customer per academic year for college training is \$3,500 for tuition, fees, books, room and board, and transportation; or 80% of his/her unmet need; or his/her OVR gift aid maximum; or his/her commuter gift aid; whichever is less, provided it does not result in an over award. Costs for support services necessitated by the functional limitations of the impairment are exempted from this maximum. (See Attachment I, OVR Training Definitions for additional information regarding these terms.)

OVR's unmet need is 80% of:

- the cost of attendance at the college as determined by the FAA
- minus the family contribution
- minus the Pennsylvania Higher Education Assistance Agency (PHEAA) grant
- minus the PELL grant

The cost for part-time attendance (less than the minimum number of credits/hours required by the College for full-time status), is prorated according to the cost of full-time attendance.

- Obtain the cost of the college's part-time attendance and the cost of full-time attendance for the customer.
- Divide the cost of full-time attendance into the cost of part-time attendance. Multiply this percentage by \$3,500. This represents OVR's maximum payment.
- Continue to work the formulas on the OVR-169 form using the new cost figures to determine the appropriate payment.

AUTHORIZATION PROCEDURE

1. Use Fee Schedule Number 59801, "Financial Aid for Training." This number includes all educational costs.
2. Divide the total amount of OVR financial aid for the academic year by the number of semesters, terms, etc., in the academic year.

Fiscal Assistants shall process invoices only after the period of time when the college gives refunds has passed. The last refund date is usually included in the college catalogue; a copy should be given to the fiscal assistant. For students who must withdraw, OVR may pay an amount in accordance with the school's published withdrawal payment policy.

OVR's authorization to the college may be used to pay for any portion of a customer's educational costs. All funds are paid to the training institutions.

BUSINESS, TRADE AND TECHNICAL (BTT)

OVR customers shall apply for PHEAA and PELL grants. OVR will not provide financial aid to customers who fail to submit a PHEAA application and/or a FAFSA application when appropriate.

FAFSA AND COST DETERMINATION

1. Advise customers to complete the FAFSA application as soon as possible. Some schools may require an additional form be filed if they do not utilize FAFSA services. The student must have completed a FAFSA application for the regular academic school year.
2. The originating counselor forwards to the supervising counselor customer information including an updated OVR-105 at least 60 days prior to the start of the training.
3. The supervising counselor determines the school's costs and customer grants and scholarships.
4. The supervising counselor calculates the costs using the OVR-169 BTT and prepares the authorizations. It may include a signature line and date to verify the school cost information and source.

FINANCIAL NEEDS TEST

Use the OVR-105 to determine financial eligibility and family contribution for BTT Training. The yearly family contribution may be prorated per term.

PAYMENT CALCULATIONS

The maximum amount Pennsylvania OVR/BBVS shall provide a customer per academic year for BTT is \$4,500 for tuition, fees, books, room and board, and transportation. Imposition of the new cost maximum for Business, Trade and Technical training (BTT) is for customers beginning coursework in a BTT training program on or after August 1, 2001. Customers having begun a BTT training program prior to August 1, 2001, are continued to the conclusion of the program using the previous cost maximum, provided the program is continued to its logical conclusion without interruption. In the event of an interruption, the new cost maximum applies to future BTT programming. Costs for support services necessitated by the functional limitations of the impairment are exempted from this maximum.

Use the following formula to calculate the OVR payment:

Actual Tuition and Fees	\$ _____
(+) Books & Supplies (as estimated by school or actual costs)	+ _____
(+) Transportation or Room and Board	+ _____
Total Costs	\$ _____
(-) Grants + Scholarships + Financial Contribution per OVR-105	- _____
OVR Tuition Calculation	\$ <u> </u>
OVR Payment (Use the lesser of the Tuition Calculation from above or \$4,500.)	\$ <u> </u>

The cost for part-time attendance (less than the minimum number of credits/hours required by the College for full-time status), is prorated according to the cost of full-time attendance.

- Obtain the cost of full-time attendance and the cost of part-time attendance for the customer.
- Divide the cost of full-time attendance into the cost of part-time attendance. Multiply this percentage by \$4,500. This represents OVR’s maximum payment.
- Continue to work the formulas on the OVR-169BTT form using the new cost figures to determine the appropriate payment.

AUTHORIZATION PROCEDURE

1. Use Fee Schedule Number 59801, “Financial Aid for Training.” This number includes all educational costs.
2. Divide the total amount of OVR financial aid by the number of semesters, terms, etc., in the academic year.

Fiscal assistants shall process invoices only after being notified by the supervising counselor that the period of time when the BTT school gives refunds has passed. The last refund date is usually included in the BTT catalogue; a copy should be given to the fiscal assistant.

For students who must withdraw, OVR may pay an amount in accordance with the school’s published withdrawal payment policy. Supervising counselors will ensure that OVR does not exceed the excessive gift aid limit.

OVR’s authorization to the BTT may be used to pay for any portion of a customer’s educational costs. All funds are paid to the training institutions. If BTT schools will not disperse funds, OVR may authorize maintenance directly to the customer. Maintenance may only be paid for costs in excess of normal expenses and that are necessitated by the customer’s participation in a vocational rehabilitation program. The District Administrator and District Manager will determine appropriate costs for maintenance.

NONTRADITIONAL TRAINING

On occasion, correspondence, distant learning, or other non-traditional methods of training have proven effective. These should be used **ONLY AFTER STUDYING OTHER OPTIONS** and concluding it is the best alternative. The District Administrator, District Manager or their designee must approve this training. Determine if the school receives PHEAA/PELL Grants. If the program is college or a business/trade/technical school, apply the appropriate guidelines. Otherwise, encumber funds at the same rate the school is charging the general public; however, confirm in writing with the school that it will accept OVR's policy of paying only for completed courses.

AUTHORIZATION

Use Fee Schedule Number 59800 for all financial aid for costs that are not College or BTT.

Attachment I, Training Definitions

PHEAA

Gift aid is any financial aid that is not earned and does not have to be repaid.

Excessive gift aid means that the total gift aid an individual receives is more than the individual's total education cost. Educational costs include tuition, fees, room, board, transportation, and an allowance for books and supplies. All PHEAA grant recipient's financial aid is checked to make sure he/she has not received excessive gift aid. OVR also requires that a gift aid test be applied to any recipient of OVR financial aid for training even if the customer has not received a PHEAA grant.

Excessive Gift Aid Limits as defined by PHEAA

- Dormitory student (lives in housing owned or supervised by school):
The actual cost of tuition, fees, room and board plus \$700 for books and supplies.
- Off-campus student (attends school from a residence other than parents' residence):
The actual cost of tuition and fees plus \$4,300 for independent students.
The actual cost of tuition and fees plus \$3,650 for dependent students.
- Commuter student (attends school from parents' residence):
The actual cost of tuition and fees plus \$4,450 for independent students.
The actual cost of tuition and fees plus \$2,550 for dependent students.
- Personal Education Expense Allowance, \$300.

OVR's gift aid maximum is

- PHEAA maximum gift aid amount
- Minus the PELL grant
- Minus the PHEAA grant
- Minus other grants and/or scholarships.

Over-award means that the financial aid (including loans, not just gift aid) an individual receives is more than the cost of attendance. The FAA is required to apply the over-award test to any student receiving federal financial aid, such as a Stafford Loan. If an over-award condition exists, the FAA may need to make an adjustment to the student's financial aid.

Cost of attendance includes the above stated educational cost plus an allowance for personal items such as clothing, laundry, recreation, transportation, etc., as determined by the FAA.

Commuter is an individual who travels to and from his/her primary residence to attend school.

OVR's commuter gift aid maximum is

- Tuition and fees
- Plus the OVR commuter allowance
- Minus the PELL grant
- Minus the PHEAA grant
- Minus other grants and/or scholarships.
- It does not include a meal allowance

**OFFICE OF VOCATIONAL REHABILITATION
BUSINESS, TRADE, or TECHNICAL SCHOOL
FINANCIAL AID DETERMINATION**

Academic Year _____ Terms: Fall Winter Spring Summer

District Office _____ Counselor _____

Name _____

Social Security Number _____ Age _____

Address _____

Institution _____

Student Enrollment Status: Full-Time Part-Time Commuter Student: Yes No

Commuters one-way Travel Distance _____ Approved Mileage Rate _____

Client Release Statement: I hereby request the release to the Office of Vocational Rehabilitation of all information necessary to complete the items listed on this form. This information will be used solely for the purpose of determining the amount of financial aid that OVR can provide and will remain confidential unless expressly released by me in writing.

Date _____ Student Signature _____

Parent Signature _____

(only necessary if student is under

age 18)

1. Actual Tuition and Fees

\$ _____

4. Pell Grant

\$ _____

2. Estimated Cost of Books and Supplies

\$ _____

5. PHEAA Grant

\$ _____

3. Room and Board Costs or Travel

\$ _____

6. Other Grants & Scholarships

\$ _____

Is student in default status? Yes No

Time frame to which this information is applicable:

From _____ To _____
Month/Day/Year Month/Day/Year

Student Enrollment Status (form should not be delayed if enrollment status is not available) Full-Time Part-Time

Date _____ School Representative Signature _____
(Optional)

BTT FORMULA and CALCULATION

Actual Tuition and Fees

\$ _____

(+) Books and Supplies (estimated by school or actual figures)

+ _____

(+) Transportation or Room and Board

+ _____

Total Costs \$ _____

(-) Grants + Scholarships + Financial Contribution (per OVR-105) -

OVR Tuition Calculation =====

\$ _____

OVR Payment (Enter lesser of the Tuition Calculation from above or \$4,500) \$ =====

OVR
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF LABOR AND INDUSTRY
OFFICE OF VOCATIONAL REHABILITATION

TRAINING WAIVER REPORT
COLLEGE AND BUSINESS, TRADE & TECHNICAL SCHOOLS

Customer _____ Number _____

College/BTT _____

Year in School _____ Year of OVR sponsorship _____

[] Commuter (round trip mileage _____) [] Residential _____

Days per week _____

Is customer in default status? _____

Annual family income and source _____

Annual customer income and source _____

Waiver requested for term/semester _____

Starting date _____

Ending date _____

Amount of waiver requested for above period (over and above OVR maximum) _____

Waiver Approved _____ Waiver Not Approved _____

Rationale for waiver decision:

District Administrator/Manager Signature

Date