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## Training Grant Frequently Asked Questions - DVR Staff (Revised: September 2016)

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### ***Completing the Training Grant (TG) Form***

**Will schools accept the training grant (TG) form without seeing the consumer's signature?**

Yes. The UW System and the Wisconsin Technical College System have agreed to accept a "Y" in the "released signed cell" without seeing the signature. However, we have agreed to send financial aid offices (FAO) a copy of the signed TG form, if requested.

**Do we need to obtain a new signature on the DVR grant form every year before providing it to the FAO?**

Yes.

**Will the form work for programs where the academic year is not semester-based e.g., Upper Iowa whose academic year is 6 terms?**

Yes. Enter the number of payments based on the number of terms per academic year. For example, for Upper Iowa, 6 would be entered in the *# of payments* cell.

**Should we indicate three payments on the form if summer school is included?**

No. The form will calculate three equal payments, underpaying the fall and spring semesters and overpaying the summer semester. Determine the best way to divide up the payments, case note the payment amounts, and communicate the payment schedule to the Center for Consumer Payments (CCP) by including the information in the comments section of the TG form.

**When do we check additional living expenses as Y?**

Approval of additional living expenses, such as housing and food costs, should be determined on a case-by-case basis. Policy states that if participation in an IPE causes the individual to have additional living expenses, then indicating yes on the TG form is appropriate.

***REMINDERS:***

- Individuals who do not have administrative approval for private/out of state school attendance are **not** eligible for additional living expenses.

- If there is a training program closer to the individuals home that allows them to obtain the same training and they choose to go attend a program that is further away from their home then the consumer is **not** eligible for additional living expenses.

**What should we do if a school has designated 9 credits as fulltime for a student due to his/her disability? Do we enter 12 credits on the form?**

No. The TG form should indicate the actual credits a student is taking. Additional funding can be requested using the exception process. The reason for the exception would be that, although the student is taking fewer than 12 credits, the school considers the student fulltime as a disability accommodation.

**When can I send the TG to FAO for processing?**

Financial Aid Offices have asked DVR to wait until July 1 to begin processing TG's.

**When can I process the payment?**

TG payments to the *in-state accredited private and public schools* can be made after the TG has been confirmed by the FAO which will occur approximately 10-15 days into the semester. (known as the census date) TG payments to *non-accredited private or out of state school* students are also made via a purchase order made and can be processed upon completion of the training grant but not before July 1.

***Exception Request Process***

**What if the consumer is happy with the DVR training grant? Do I still need to explain the exception process and the appeal rights?**

Yes. The Rehabilitation Act requires that consumers be informed of their right to appeal any denial of services. Since the fee schedule limits the amount DVR will pay for a service, the consumer must be informed of his/her rights to request an exception and/or appeal.

**Is the exception process used for purchasing a computer?**

Very few schools include the cost of a computer as part of the COA budget. Check with the school's FAO as a first step.

***For schools who don't include it***, purchase it using DVR's normal purchasing process and fee schedule. Add it to the IPE as a service.

***For schools who include it in the COA***, use the exception process to request any additional funding needed.

**How do I know if an exception request is appropriate for a given consumer?**

Discuss with the student all the funding s/he is receiving (financial aids, TG funds, and parental contribution) to determine if the student has sufficient funding for the training. If funding is adequate, an exception is not warranted. If funding is not adequate, use the exception process to request additional funding beyond that offered.

**What if the consumer contends that the parental contribution is unmanageable?**

Use the exception process to request an offset of the parental contribution. The consumer must provide detailed information as to why the parental contribution is unmanageable.

***Payment Processing and Funding***

**How will payments be made to the school in-state public and accredited private schools?**

Once the term has begun, the TG amount will be verified by the school by matching the amount against registered credits, Field staff will complete a PO and send a copy of the TG to CCP, DVR (CCP) will issue a check for the approved amount directly to the school. The school will apply the amount to the student account. Once the funds have been applied to the account balance, the student can receive payment from the school to use for other expenses if the balance is paid.

**How will payments be made to non-accredited private or out of state schools?**

Once the TG has been calculated, field staff will complete a PO to the school, the school will invoice DVR and apply the funds to the student account. Those students will be required to provide proof of payment for school costs, a schedule and grades to DVR to receive payment prior to the next term.

**What do I do if the school will not accept a purchase order from DVR?**

Direct payments can be used in those cases. Contact the school directly to confirm non-receipt of purchase order, create casenote which includes date, contact information and name of school personnel. Complete an exception for Supervisory Review- The supervisor must confirm that the school will not accept a purchase order. Those students will be required to provide proof of payment for school costs, a schedule and grades to DVR to receive payment prior to the next term.

**Is it necessary to link a copy of the training grant form to the direct payment or purchase authorization when requesting a payment for the next term? (2<sup>nd</sup> semester, trimester, quarter, etc.?)**

Yes. But if there is no change, link a copy of the most recent TG you have on file to the purchase authorization or direct payment request. *In-state Public or accredited Private School:* Reroute the TG through the FAO and get a confirmed amount before completing a purchase authorization. *Out of state or non-accredited Private School:* It is best practice to check with the consumer to see if s/he has received an amended Financial Aid Award determination, before assuming that what you have on file is the most current amount.

**How do we handle second term exceptions after the semester has begun?**

Best practice is complete all exception requests prior to or as close to the beginning of the semester/term as possible to allow the FAO to make adjustments in the student's financial aid, if needed. Immediately inform the school of the amount of the exception funding as soon as the exception is approved. To prevent over awards, DVR or the student should talk with the school before moving forward with the exception process.

**How will students pay for books and supplies?**

Students should be informed that they should not count on getting a training grant payment at the very start of the term. If DVR is paying the school directly or if DVR is providing a direct payment, it is unknown if those funds will be available prior to the need to get books. Students should plan for and have funds available to pay for books. If DVR would provide funds in excess of the training grant, DVR would report the payment to the school and the student would have to pay the funds back to the school as an over-award. Each school has a different policy with regard to the purchase of books and use of financial aid for this purpose. It is the student's responsibility to get information from financial aid about how best to purchase books. DVR may be able to make an exception and use the exception process for extraordinary circumstances

although these situations would be rare. This policy is the same for students who receive SSI/SSDI.

### ***Miscellaneous***

#### **After the FAO completes the form do we send the consumer and the DVR grant form back to the FAO if s/he needs more funding?**

No. If additional funds are needed, request them using the exception process.

#### **If the consumer dropped courses first semester and DVR paid for the courses, do we automatically deduct the amount paid for the courses from the second semester payment?**

A decision should be made on a case-by-case basis on how to proceed. In some cases, it may be appropriate to adjust future payments and under other circumstances, no further action may be necessary.

The only time DVR requires repayment of DVR funds is if fraud or dishonesty was the reason for the overpayment. For example, the consumer did not use the funds as intended. The counselor should address the reasons it was necessary for dropping classes with the consumer and develop a strategy to ensure there is not a recurrence. This discussion and resulting strategy should be documented in an IRIS case note.

#### **What are some expenses that would fall outside of the DVR training grant?**

All disability related expenses. All items needed to support the training program that are not included in the cost of attendance items i.e. tuition, books/fees, transportation, personal/miscellaneous, room/board. Use DVR's regular purchasing process, and the DVR fee schedule to fund these services. List the services on the IPE.

#### **What if childcare is not included in the COA, what is the best way to handle these situations?**

Not all schools handle child care in the same way.

If the school considers childcare/dependent costs as part of the COA budget, have the student contact the financial aid office to adjust the cost of attendance budget to include child care. If the consumer did not notify the school about the need for child care, or if the individual has additional needs beyond what was offered through the TG, use the exception process to obtain additional funding. This funding must be reported to the school.

If the school does not consider child care/dependent care as part of the COA budget, fund the request as a secondary service. Include it in the IPE, use the DVR fee schedule, and purchase child care using our regular purchasing process.

#### **.What if the consumer chooses a more expensive in-state public school when there is a program close to home that is more cost effective?**

DVR will support the training program that will meet the consumer's need at the least cost to DVR. If a consumer's choice is more expensive, and there is a more cost effective option, discuss DVR's policies with the consumer and determine the appropriate funding DVR can provide. Consultation with supervision is recommended in these situations.

**Can DVR pay for a consumer's application fee for schooling outside of the DVR training grant?**

As a first step, the consumer should contact the school to see if the fee can be waived. If a waiver is not possible, DVR can pay the fee.

**Does a signed TG form allow us to exchange information with other departments at the school or obtain information not related to the TG?**

Yes, the release of information (ROI) signature on the TG form allows DVR and the school to exchange financial aid information, student account information and academic record information for public schools beginning Fall 2014. Sharing other information e.g., disability information, is considered outside the administration of the DVR program and requires a signed release.

**If a consumer is receiving other grants or training assistance such as Veteran's Administration (VA) benefits, Worker's Compensation (WC), or Workforce Investment Act (WIA) funding, how should those be reported?**

Students should report all other grants, as required, when completing their FAFSA application. DVR should also ask students about other grant assistance they are receiving. The student and/or DVR should report the information to the school, if the student had not previously reported it, to prevent duplicate payments for the same cost of attendance item or the creation of an over-award.

Schools do not handle grant assistance from other entities in the same way. Some schools may adjust the financial aid package, and at other schools, certain grants will have no impact. It is important for all parties i.e. the student, the FAO, and DVR to share other grant information so that the appropriate action is taken. If an over-award is created, the student is responsible for repayment.

**How should we address attendance at a private/out of state school in the IPE?**

If the IPE is completed prior to going through the administrative approval process, indicate UW, Technical College or equivalent in the provider box on the IPE. Once an administrative decision has been made, amend the IPE to reflect the school the person is attending. If the student is responsible for the extra costs associated with attendance, that information should be documented in the IRIS case record or included in the IPE responsibility section.

**Does the counselor make the decision that private school/out of state school is needed?**

Both the consumer and the counselor should make the decision based on the consumer's IPE needs. If the counselor and consumer agree that private or out of state school is necessary, the counselor should complete a case note detailing the rationale for this decision and submit it for administrative approval. If the VRC determines it is not necessary, the VRC should explain the reasons for the decision and provide appeal information to the consumer.

**How do we fund optional educational opportunities such as overseas training, internships, and attendance at professional conferences?**

If providing those is a necessary IPE service because it has educational value for the student but is not required for a degree, those should be paid for outside of the TG process. The service should be added to the IPE.

**Since we don't have a student contribution, why don't we cover all COA expenses for all students as we do for Social Security (SS) consumers?**

Under our Federal Regulations, DVR is allowed to establish fee schedules for services. DVR did place a cap\* on the DVR training grant. However, the exception process was established to request additional funds beyond those provided through the training grant to meet IPE needs.

Wisconsin has established an exception to the fee schedule for persons receiving Social Security benefits. Federal regulations also prohibit funding of training at post-secondary institutions unless maximum effort has been made to obtain funds from sources other than DVR. Therefore:

- SSI/SSDI recipients must make maximum effort to find other funding.
- SSI/SSDI recipients are also not exempt from the comparable benefits requirements.

**Does the training grant fee schedule also apply to masters and PhD situations where PELL grants are not available?**

Sometimes significant grants and assistance are available to post graduate students, but often special application and special effort are required to apply for them. Where comparable benefits are available, the student will be expected to make the maximum effort required by the law to obtain them. When comparable benefits are not available, use the exception process to request additional funding, if needed. The graduate school box should be changed to Y.

**If a consumer is no longer eligible for financial aids because s/he exceeded the 150% credit limit, is an exception required to provide a TG?**

No, an exception is not needed unless the consumer has exceeded the maximum duration for post-secondary training outlined in the Policy Manual, Addendum A. If a consumer is no longer eligible for financial aids because s/he has not completed the degree within the 150% credit limit, s/he needs to demonstrate that maximum effort has been made to obtain comparable benefits before DVR can assist. The consumer should appeal the 150% rule with the FAO as a first step to demonstrate maximum effort. Schools handle appeals in a variety of ways.

Check out the school's website for more information or contact the local FAO office for additional information. The VR Counselor or other DVR qualified staff should review the consumer's actions, determine if maximum effort has been made, and document the findings in the case record.

**When calculating the duration of training, do we count the time the consumer attended school before s/he was working with DVR?**

No, include only time when the consumer was working with VR. If it is anticipated that the consumer will exceed the durations outlined in the fee schedule and an extension will be needed, consult with your supervisor early on so that services are not delayed.

**If a DVR consumer comes of the OOS wait list and quickly develops an IPE, can DVR fund school for them once the term has begun?**

All schools have established a census date. This is a date generally 10 days into a semester where the school may no longer allow students to add courses, receive FA or to become enrolled, once the census date has past, DVR will not authorize TG payments for consumers. The consumer/student will have to wait until the next term to receive a TG.

**What if an existing DVR consumer/student fails to return the signed TG until after the census date?**

If a DVR consumer has applied for FAO and been excepted in a program supported by the IPE, DVR staff should process the TG as soon as possible. The student should be made to understand that this delay will also delay the processing of the TG and payment. If a consumer provides the signed TG form to DVR beyond the census date, they will be eligible for the next term and not the current term.

**What is the student identifier?**

This should be completed with any information the school wants us to use to identify the student on the check sent to them with multiple students. This is usually the student ID number and/or term indicator but it could be something else.

**What should be included in the Confirmed Amount Term 1 and 2?**

The confirmed amount is the dollar amount the FAO confirms back to DVR that is okay to include in the payment to the school. It is based on the credits but the credits are listed elsewhere. This is where they would make a change if the credits and or dollar amounts have changed.