

FAQ
Inclusive Higher Education
GVRA/VR Funding and Support
June 2020

Brief Background. The summary includes a list of frequently asked questions based on the changes to VR funding for approved Comprehensive Transition Program (CTP).

Frequently Asked Questions

1. Why were the changes needed?

- a. The changes were based on feedback received from the Rehabilitation Services Administration. The previous model was not supported by the regulations of the Rehabilitation Services Administration and risked funding opportunities for all students and clients of GVRA. GVRA/VR was operating outside the policies and regulations, which indicates federal/state funds are to be used for tuition/fees of qualified students for credit classes towards a degree. Previous decision to pay the tuition for Inclusive Higher Education non-credit courses is outside this policy, which prompted the need for change.
- b. The federal performance measures expected of VR programs are based on providing services that lead to measureable skill gains, and/or credentials, and a competitive integrated employment outcome. Of the 237 students, only 23 have secured paid employment that lasted for at least 90 days with salary range 7.25 – 16.00.

2. What was the process for the proposed changes to the support provided to students who choose to participate in an inclusive higher education opportunity to reach their competitive integrated employment goal?

- a. GVRA/VR transition leadership, the Georgia Inclusive Post-Secondary Education Consortium (GAIPSEC) leadership, and the nine Inclusive Post-Secondary Education (IPSE) program directors met regularly between the months of February 2019 – March 2020 to discuss the potential changes to the Inclusive Post-Secondary Education funding model.
- b. The proposed changes were shared with the Georgia Council on Developmental Disabilities (GCDD) leadership, Georgia Department of Education (GaDOE), and the GAIPSEC on March 20, 2020 and updated based on their feedback. Following that meeting, the proposed draft was shared with the nine IPSE programs on April 15, 2020 and with VR personnel on April 30, 2020. A meeting with the State Rehabilitation Council chair and Director of the Client Assistance Program occurred May 12th to discuss the impact to VR clients and the importance of communicating the changes timely.
- c. May 18th the SRC executive committee was the audience for the presentation of the IPSE service strategy, which is the recording shared for

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public comment. Public discussions occurred over 65 days. Public comment were solicited over 15 days.

3. What is the level of support provided by GVRA and what are the associated outcomes?

- a. GVRA/VR agrees with many of the commenters that the IPSE programs afford a unique opportunity for young people with intellectual disabilities and that the programs foster independence, increase in self-determination, and can be quite empowering for the students. Which is why GVRA/VR has a long history of supporting the IPSE programs as they were developed in GA.
- b. VR assisted 237 students while they attended the IPSE programs, totaling seven million dollars (2012-2020).

4. Will GVRA reconsider the decision to only fund the tuition and services directly permissible under the rules and regulations of the RSA in association with non-credit courses?

- a. The new service strategy does not fund non-credit courses, but does fund other services provided to VR clients/students and outlines the effort to connect **ALL** clients/students with a provider prior to completing their IPSE program to be sure the services (individualized job development, short-term job coaching, as examples) are established prior to exiting the program with input from the students and the IPSE programs to ensure quality competitive integrated employment outcomes are pursued and secured.
- b. The decision to pay the IPSE programs for offering four semesters of pre-employment transition services (Pre-ETS) allows VR to continue to support the students with a service that is already a component of the IPSE programs. GVRA is continuing to work with the IPSE programs and the GAIPSEC to identify additional services provided by IPSE programs that can be funded by VR to support the students in their growth and development as well as developing employment skills that lead to quality employment outcomes.

5. What will happen to the students that are already participating in IPSE with VR support?

- a. Students who are in their second, 3rd, or 4th year, depending on the program, will continue to receive the VR financial support similar to those received in 2019-2020.
- b. The new VR financial service guidelines will include the incoming students for Fall 2020.

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- c. Additional funding available for approved CTP facilitates the application of comparable benefits to reduce the tuition/fees costs to the students (such as Pell, foundations, grants). The Georgia Council for Developmental Disabilities continues to provide grants to the nine programs to keep program costs manageable for families.

6. What was the methodology used to arrive at \$3,000 to demonstrate it is reasonable, allowable, allocable, and necessary?

- a. GVRA had multiple meetings with the GAIPSEC and IPSE programs over 18 months to discuss options, reviewed Think College recommendations, as well as looked at the fees paid in other states for IPSE programs. For example, Colorado VR offered \$3,000 for Pre-ETS for IPSE in their state, which provided GA a market comparison to facilitate reasonable pricing. Additionally, GVRA updated the Provider Guidelines Manual to establish standards for all GVRA approved services. Adjusting the IPSE programs rate fee allows them to be more in line with other approved services rate paid to providers.
- b. As noted in the Provider Guidelines Manual Overview of Rate-Setting Methodology, GVRA has the authority under the Workforce Innovation and Opportunity Act and the Federal Regulations 34 CFR 361 to develop and implement flexible procurement policies and methods that facilitate the provision of services, and that afford individuals meaningful choices among the methods used to procure services.

7. Does the rate established include the cost of students' room and board?

- a. The IPSE programs (8 of the 9) are delivering the Pre-ETS activities and VR is agreeing to pay for Pre-ETS at the \$3,000/semester rate.
- b. One of the IPSE programs is offering courses for credit, VR is continuing to pay the tuition, fees, and room and board for those students eligible for VR.
- c. If a student requires additional services that the IPSE program is approved to deliver, those additional services as outlined on the IPE could be considered for VR funding. If maintenance (room and board) is needed, that service could be approved by the counselor and paid at the rate VR pays maintenance.

8. What portion of those costs are being allocated to Pre-ETS?

- a. Pre-ETS was one service identified that the IPSE programs in GA are all offering to move us away from paying the tuition and fees for non-credit courses. The \$3,000 rate per semester is for the delivery of Pre-ETS.

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9. In the presentation Basic Culinary was used as an example, is that considered a Pre-ETS activity?

- a. No. Basic Culinary typically is considered an employment skills training service.
- b. If an IPSE program wanted to be considered to be an approved provider for employment skills training, they would need to apply.
- c. If a student is receiving training in basic culinary, the rate would be based on that service, which is not associated with Pre-ETS.

10. For those students with an Individualized Education Plan (IEP), how and when is the Georgia Department of Education responsible for the cost?

- a. The IPSE programs in GA are designed for students after they complete high school. The GA DOE has not considered dual enrollment for Special Education funding for IPSE.

11. Are you requiring the completion of an application for Free Application for Federal Student Aid (FAFSA)? If yes, when a student gets a Pell grant how is that deducted from the need?

- a. Yes. If Pell funding is available, those funds are applied to the tuition fees as a comparable benefit.

12. Are there only two Comprehensive Transition Programs (CTPs) in Georgia and will VR will only support students in certain programs?

- a. Most of the IPSE programs in Georgia are CTP. IPSE programs with the Comprehensive Transition Program designation in Georgia are the following:

| University | Program |
|---------------------------------|--|
| University of West Georgia | Project WOLVES |
| University of Georgia | Destination Dawgs |
| Georgia Institute of Technology | EXCEL |
| Kennesaw State University | Academy for Inclusive Learning and Social Growth |
| Georgia State University | IDEALS |
| East Georgia | CHOICE |
| Georgia Southern University | Eagles |
| Albany Technical College | LEAP |