

South Carolina Vocational Rehabilitation Department Consumer Services Policy



Policy Name: Training for Non-Degree Credentials

ID: CSP 4.991

Issued by: Consumer Services Dept.

Revision Number: 01

Effective Date: 11/06/2023

Revision Date:

Retirement Date:

1.0 POLICY STATEMENT:

The South Carolina Vocational Rehabilitation Department (SCVRD) supports training for non-degree credentials that:

- A. Foster viable and flexible career paths and life sustaining wages and benefits for [consumers](#); and
- B. Increase consumer attainment of recognized post-secondary credentials (e.g., certificates, licensure, post-degree certificates) that are relevant for the skill needs of employers in the [labor market area](#) in which a [consumer](#) or intends to reside.

In particular, this policy provides guidelines for the SCVRD's provision of non-degree credential training when this service is necessary for a consumer to prepare for, secure, retain, advance in or regain an agreed upon [employment outcome](#) that is consistent with the consumer's unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice.

2.0 SCOPE / APPLICABILITY:

2.1 This policy applies to consumers who seek and participate in training that provides the following types of recognized credentials:

- A. Certificates;
- B. Industry certifications; and
- C. Licenses/licensure.

2.2 The training must be provided by accredited, approved training providers. The list below is not all inclusive:

- A. Public colleges and universities;
- B. Technical, junior, community colleges;
- C. Private and proprietary postsecondary institutions;
- D. Health-related institutions;
- E. The South Carolina Vocational Rehabilitation Department's LEARN Center;
- F. High school Career and Technology (CATE) and other dual credential programs;
- G. Specialized and occupational-vocational training providers (approved by the appropriate state authorities in which their training facility is located); and
- H. [Eligible training providers](#).

3.0 STANDARDS:

3.1 VR Counselor Responsibilities.

The VR counselor must:

- A. Conduct and coordinate assessment activities with the consumer as needed to determine if the consumer has the strengths, resources, abilities and capabilities to succeed in training for non-degree credentials in relation to the development of the employment goal as applicable.
- B. Assist the consumer or the consumer's representative, through [appropriate communication modes, to acquire information necessary to make an informed choice about the non-degree credential training](#), including the providers of these services (see [34 CFR 361.52\(c\)](#)).
- C. Allow the consumer the opportunity to review the specifics of a non-degree credential training opportunity related to the agreed upon [employment outcome](#) as listed on the current, active IPE. Specifics include the time-frames and the training outlines (e.g., syllabus, guides, etc.).
- D. Provide the consumer with [information for potential non-degree credential training opportunities](#) provided by the local workforce board, adult education programs (if appropriate), the [South Carolina Department on Aging, ReadySC](#), colleges, universities, as well as directly by the [SCVRD](#).
- E. Document counseling and guidance to gauge and promote the consumer's commitment to successful completion of training for non-degree credentials.
- F. Include the college, university, occupational-vocational training service on the IPE that is appropriate to the specific non-degree credential training program when the SCVRD:
 - (1) Will provide financial assistance; or
 - (2) Will not provide financial assistance but will provide other services that will help the consumer maintain stability and/or address accommodations during the training.
- G. Evaluate Training Progress with the consumer by reviewing progress reports received from the training provider.

3.2 Consumer Rights and Responsibilities

A consumer's successful participation in training for a non-degree credential requires the consumer's active involvement in all aspects of SCVRD assistance. The consumer must:

A. Demonstrate Engagement

The consumer must actively Engage in career exploration, labor market research and assessment(s) as necessary to determine if the employment goal and related non-degree credential training is consistent with the consumer's strengths, resources, priorities, concerns, abilities, capabilities, and informed choice; and

B. Provide Required Documentation

The consumer must provide the following documentation to the VR counselor prior to the start of the training:

- (1) Acceptance documentation from the training provider (provided only once or in the case of reinstatement);
- (2) Verification of [application for available financial aid](#) and the financial aid award (as applicable);
- (3) Documentation of any other grant(s), tuition waiver amounts, and non-merit-based scholarship(s) awarded;
- (4) A post-secondary non-degree program of study as provided by the training provider;
- (5) Written justification for a change in the non-degree program of study (e.g., a change from welding to plumbing);
- (6) List of required books and supplemental items as indicated on the program syllabus; and
- (7) Documentation of post-secondary training completion (e.g., diploma, certificate, or licensure).

C. Actively participate in IPE services

The consumer must actively participate in non-degree credential training and other VR services through:

- (1) Maintaining financial aid eligibility (as applicable)
- (2) Enrollment in the approved non-degree program;
- (3) Acceptable attendance rates as defined by approved non-degree credential program;
- (4) Participation in other services as included on the IPE (e.g., maintain diabetes treatment); and
- (5) Register with the training provider's disability services office (if available) to obtain available accommodations, if needed.

D. Maintain Satisfactory Training Progress

The consumer must:

- (1) Meet satisfactory training progress as defined by the approved non-degree credential training program; and
- (2) Complete the non-degree credential or licensure training program within the timeframe allowed by the training provider as identified on the current, approved IPE.

3.3 *Monitoring Consumer Progress*

When a consumer struggles to maintain satisfactory training progress, the VR counselor must ensure that the consumer receives the resources and supports to assist them with disability related issues, including available supports and accommodations (e.g., [disability resource centers](#) offered by colleges and universities), community resources or the SCVRD, when the training provider does not have a disability services office.

3.4 Changes to the Training Program

- A. The consumer must communicate and discuss any changes in their non-degree credential training program with the VR counselor prior to making the changes in the program.
- B. When a consumer makes changes without discussing the specifics of potential changes with the VR counselor, the SCVRD is not obligated to provide assistance to the consumer. The VR counselor must pursue adjustments to the IPE and post-secondary non-degree assistance with the consumer.
- C. The VR counselor must document the justification for the change in the consumer's electronic case record.

3.5 Training Requirements

The SCVRD may provide financial assistance for non-degree credential training services with the following requirements.

A. Support of the Employment Goal:

- (1) The specific non-degree credential training program is required to achieve or advance in the employment goal as identified on the IPE.
- (2) The training supports an [employment outcome](#) that is consistent with the consumer's unique strengths, resources, priorities, concerns, abilities, capabilities, career interests, and informed choice.

B. Labor Market and Legal Considerations:

- (1) [Labor market information \(LMI\)](#) for the [labor market area](#) must support the employment goal, and related non-degree credential training, in for the area in which a consumer resides or is willing to reside at the successful completion of the training; and
- (2) The consumer must have no legal impediments that would prevent employment in fields related to the employment goal and the related non-degree credential training that the consumer seeks.

3.6 Dual Enrollment for High School Students

Dual enrollment in industry credential and/or licensure training for high school students is acceptable and encouraged when the courses are necessary for the achievement of the actual (not projected) employment outcome as stated in the consumer's IPE.

3.7 Financial Aid and Comparable Services and Benefits

A. Comparable Services and Benefits:

The VR counselor must apply all available comparable benefits, including the state or [eligible training provider](#) grants, to the cost of tuition, fees, and other educational expenses.

- (1) The SCVRD considers applying for a Pell Grant as a comparable benefit whenever the training provider is eligible for Pell Grant participation (e.g., some cosmetology and barber training providers are Pell Grant participants).

South Carolina Vocational Rehabilitation Department Consumer Services Policy



(2) The SCVRD does not consider merit-based scholarships and funding to be a comparable benefit. Consumers may apply these funds to any training costs as they decide and according to scholarship stipulations.

B. Multiple Terms or Semesters:

If a specific non-degree credential training program has multiple terms or semesters, the VR counselor and consumer must explore comparable benefits for each training term.

C. Federal Student Loans:

(1) The SCVRD will provide financial assistance for non-degree credential training when a consumer is in good standing (i.e., not on default) with their federal student loan. If a consumer has a [student loan default](#), the consumer must develop a debt repayment plan with the loan servicer and provide this documentation to the VR counselor. Once the consumer has moved from default to loan compliance, the SCVRD may provide financial assistance to the consumer.

(2) The SCVRD does not require or encourage consumers to secure a student loan in order to receive SCVRD financial assistance. The choice to take out a student loan is the consumer's decision and does not involve the SCVRD.

3.8 Establishing Training Timeframes

The VR counselor and consumer are to agree upon and document the timeframe for completion of a non-degree credential training program. The sources for establishing the timeframe must come from the training materials and training provider:

A. Exceeding Established Time Frames:

As soon as it is apparent that the consumer will exceed the established training timeframe, the VR counselor must secure area supervisor exception approval.

B. Prorated Time Frames:

Prior to SCVRD assistance, if a consumer has transferable non-degree credential training credit as applicable (e.g., cosmetology, nursing assistant, or barbering training hours), the VR counselor must apply this pre-existing credit to the non-degree training plan and adjust the required timeframe for the consumer to complete training. The VR counselor must base the adjustment on full-time enrollment.

C. Developmental Courses:

When a consumer requires developmental courses (also known as remedial courses) to strengthen training skills, the VR counselor must consider comparable benefits to provide this training, including adult education programs. If the consumer requires developmental training courses for more than one training term, the VR counselor must seek a policy exception to continue to provide financial assistance.

South Carolina Vocational Rehabilitation Department Consumer Services Policy



D. Measurable Skill Gains and Credential Attainment:

The VR counselor must record whether progress in a non-degree training program and related credentials qualify as a Measurable Skill Gains (Policy 4.92) and Credential Attainment (Policy 4.91). VR counselors may check with the SCVRD's Planning and Program Evaluation Department to verify whether a specific credential is recognized for MSGs and credential attainment.

3.9 Non-Degree Credential Training Purchases

A. Private or Out-of-State Programs/Providers:

(3) When a consumer chooses to attend a private (independent) or an out-of-state training provider, technical or state college, university, or health-related institution and a comparable credential or licensure training is available at public training institutions or a [eligible training providers](#) in South Carolina, the SCVRD assistance with tuition and fees will not exceed in-state rates for the tuition and fees..

(4) Exceptions to provide SCVRD assistance for a consumer's participation in non-degree training at a private or out-of-state training provider may apply when the training program:

- (a)** Is unavailable at a public institution, eligible training provider, or government entity in South Carolina;
- (b)** Does not meet the consumer's disability related needs, or
- (c)** Is more cost effective than the program at a public institution in South Carolina.

B. Previous Training:

The SCVRD is not responsible for the costs of non-degree credential training incurred by a consumer prior to developing or amending an IPE for this training.

4.0 PROCEDURES:

- A. IC 4.991 Training Provider Vendor Application Review**
- B. IC 4.992 Setting up a non-degree training service for a consumer**

5.0 CASE DOCUMENTATION REQUIREMENTS:

The VR counselor must ensure that the consumer's case management record (CMS) includes the following documents and case notes related to postsecondary credentials and professional and occupational licenses:

- A.** Assessments from other agencies, schools, colleges and universities including previous transcripts;
- B.** Correspondence from training providers (e.g., acceptance letters; disability services; and academic standing/probation);
- C.** Training progress reports;
- D.** Certificates and credential or licensure documents.

South Carolina Vocational Rehabilitation Department Consumer Services Policy



E. Case notes must include:

- (1) counseling and guidance sessions with the consumer related to progress in postsecondary credential or licensure training; and
- (2) Specifics of the consumer's progress including Measurable Skill Gains (MSG) must be and the name of the specific credential or licensure.

6.0 EXCEPTIONS:

A. Area Supervisors will manage exception requests on a case-by-case basis.

B. The area supervisor will review and address all requests for exceptions to:

- (1) Extend the degree training timeframes;
- (2) Payment of fees not included in the *SCVR 134 Report of Financial Aid and Assistance*; and
- (3) Purchase transcripts.

7.0 APPLICABLE FORMS/DOCUMENTS:

SCVRD staff may access the following forms in the SCVRD Documents Hub application:

- A.** SCVR 85 Individualized Plan for Employment;
- B.** SCVR 85T Individualized Plan for Employment - Transition;
- C.** SCVR 87 Review or Amendment to IPE;
- D.** SCVR 134 Report of Financial Aid and Assistance;
- E.** SCVR 135 Financial Aid Assessment;
- F.** SCVR 88 Postsecondary Degree Training Responsibilities; and
- G.** FSSP 2.30 Rate Setting for Purchased Goods and Services.

8.0 APPLICABLE REGULATIONS:

- A.** [34 CFR §361.48\(b\)\(6\)](#) Scope of vocational rehabilitation services for individuals with disabilities, vocational and other training services.
- B.** [34 CFR § 361.50](#) Written policies governing the provision of services for individuals with disabilities;
- C.** [RSA PD-19-03](#), Attachment II, Pages 15-16

9.0 DEFINITIONS / ACRONYMS:

- A.** *Consumer* refers to an [eligible individual](#).
- B.** *Counselor* or *VR counselor* apply to a vocational rehabilitation counselor employed by the [SCVRD](#).
- C.** *Fees*: The cost of attendance that indirectly supports a student's participation in their non-degree credential program.
- D.** *School*: A postsecondary training provider that offers training that leads to a non-degree credential (e.g., certification and/or licensure). For training providers who are Federal Pell Grant eligible, see [34 CFR 600.6](#).
- C.** *Tuition*: The cost of attendance related directly to the student's non-degree credential program (e.g., courses; clock or credit hours, etc.).
- D.** See the appendices, *Glossary* and *Acronyms and Abbreviations*, as you read this policy. SCVRD staff may access these appendices in the SCVRD Documents Hub application.

South Carolina Vocational Rehabilitation Department Consumer Services Policy



10.0 POLICY TRAINING, FEEDBACK, AND RECOMMENDATIONS.

- The area supervisor will report staff training for this policy in the form, *SCVR 668 Group Training Roster*.
- Please send your feedback and recommendations to the mailbox, *CServices@scvrd.net*.

Draft