

Appendix 8.10.1: Vocational Rehabilitation Agreement

Memorandum of Understanding Between
Virginia Department of Rehabilitative Services and
Virginia Association of Student Financial Aid Administrators

0.0 PARTIES

The parties involved in this Memorandum of Understanding, hereafter referred to as Memorandum, are the Virginia Department of Rehabilitative Services (DRS) and the Virginia Association of Student Financial Aid Administrators, Incorporated (VASFAA, Inc.).

In the event that this Memorandum is entered into by additional agencies or organizations, all such parties shall be identified, and subsequent sections of the Agreement shall be modified as appropriate within the format provided.

1.0 TERM

The term of this memorandum shall be three (3) years, commencing on July 1, 2008 and ending on July 1, 2011, at which time, if there are no amendments or revisions proposed by either party, this Agreement will automatically renew for an additional period of two (2) years, following signatory approval of both parties. The authorized representatives of each party shall review and evaluate the "Scope of Work" as identified in Section 7.0, on at least an annual basis.

This entire Memorandum may be amended or revised at any time with the current term of the Memorandum by mutual consent of each party. In the event of proposed amendment, revision, or termination of this Memorandum by either party, written notice shall be provided to the appropriate agent of each party at least thirty (30) days in advance of the effective date.

2.0 BACKGROUND

The cooperative relationship between the Rehabilitation Services Administration (RSA) and the Office of Student Financial Aid (OSFA) was initiated in 1979, at the encouragement of the United States Department of Education, Office of Special Education and Rehabilitation Services (USDOE/OSERS), to achieve the goals of coordination financial assistance, improving service-delivery, and preventing over awards and under awards for students with disabilities attending postsecondary institutions.

RSA and OSFA encourage each State Vocational Rehabilitation Agency and State Association of Student Financial Aid Administrators to jointly develop a professional

serving mutual clients. In the Commonwealth of Virginia, a Memorandum of Understanding between DRS and VASFAA has existed since at least 1980.

The agreed-upon procedures meet requirements of Section 472(9) of the Higher Education Act of 1965, as amended. This requires that, in determining a student's cost of attendance for Title IV financial aid programs, an allowance be included for expenses related to a student's disability that are not provided by another assisting agency. This Amendment also mandates use of the federal methodology of need analysis to determine expected family contribution and financial need.

These procedures also meet the requirements of Section 103 (a) (3) of the Rehabilitation Act of 1973, as amended. This established the State VR agency's authority to make training services available. This authority is with the provision that no training services *in institutions of higher education are paid for with funds under Title I of the* Rehabilitation Act unless maximum efforts have been made to secure financial assistance, in whole, or in part, from other sources to pay for such training.

3.0 PURPOSE

This memorandum represents a commitment between DRS and VASFAA regarding cooperative relationships aimed at improving financial aid services for students with disabilities. The purpose of this memorandum is to specify procedures for the coordination of financial aid support of DRS consumers attending postsecondary institutions in the Commonwealth. Coordination of financial assistance will enhance direct service delivery, ensure appropriate use of Federal and State program funds, and maintain compliance with legislative intent.

4.0 EXCHANGE OF INFORMATION

VASFAA will encourage Virginia post-high school educational institutions and DRS to provide each other with relevant information that may affect individuals with disabilities who are, or may be entitled to, or eligible for, services from either party. This information shall include available programs and services, applicable policies, guidelines, and procedures, eligibility criteria, and fee schedules. This information will be used solely for purposes of identification of and access to needed services for individuals with disabilities.

VASFAA will encourage each party to exchange with the other any and all necessary individual student/consumer information. This information is subject to the provisions of informed written consent (consent can be electronically scanned and emailed) of the individual and/or his/her parent/guardian, as appropriate; and in accordance with all applicable Federal and State laws, regulations, policies, and guidelines including DRS procedural guidance relating to the Protection, Exchange, and Release of Confidential Client Information. Use of the Consent to Release Information form by both parties will be encouraged (Addenda #1, RS-3e).

In addition, VASFAA will encourage each party to exchange individual student/consumer information necessary to verify over awards and/or under awards of Federal and State financial aid packages, using the electronic, excel RS-25 form, as identified in "Appropriate Coordination Mechanisms" (Section 5.0) of this Memorandum.

5.0 APPROPRIATE COORDINATION MECHANISMS

VASFAA will encourage both parties to utilize the Post Secondary training Comparable Benefits and Financial Assessment Form (Addenda #2: RS-25 form) to communicate the coordination of financial sponsorship and/or assistance between DRS and the Financial Aid Office. The following steps will be followed in completing this form:

- 5.1 The DRS Representative will provide the Financial Aid Officer with a signed consent for release of information (RS-3e). This can be faxed to the FAO with the expectation that DRS Representatives will soon have scanning capabilities as which time the RS-3e can be scanned and attached to an email sent to the FAO.
- 5.2 Part A of the RS-25 will be completed by the DRS Representative and forwarded via email to the Financial Aid Office;
- 5.3 Upon receipt of the electronic RS-25, the Financial Aid Officer will complete Part B of the RS-25 (electronically) and return to DRS within 15 working days of the financial aid decision'
- 5.4 The DRS Representative will complete Part C of the RS-25 (electronically) and return as an email attachment to the Financial Aid Office prior to the authorization of Agency sponsorship to the Business Office; and,
- 5.5 The DRS Representative and the Financial Aid Office will use the RS-25 to advise the other party of any changes in student financial awards, based on the completion of Parts A-C. This will serve as the mechanism by which DRS and the Financial Aid Office monitor over awards and under awards.

Specific responsibilities of both parties to ensure the coordination of financial assistance for those individuals mutually eligible for both programs is found in the "Scope of Work" (Section) 7.0) of this Memorandum.

6.0 SCOPE OF WORK

The responsibilities of both parties to ensure the coordination of financial assistance for those individuals mutually eligible for both programs are;

- 6.1 The Department of Rehabilitative Services agrees to:
 - 6.1.1 Ensure that consumers apply for Federal and State financial assistance, as a condition of receiving DRS financial assistance for college training.
 - 6.1.2 Continue to utilize and apply the consumer participation test (Addenda #3:RS-13) in accordance with Agency policy, but not to determine the amount of educational support to be authorized.
 - 6.1.3 Initiate the RS-25 as soon as possible in advance of the term in which postsecondary is determined both essential and appropriate for the consumer to achieve the vocational goal identified on the Individualized Plan for Employment (IPE). Forward to the Financial Aid Office for their completion of Part B.
 - 6.1.4 Determine DRS financial sponsorship based on the RS-25, adhering to policy and procedure guidelines. If there is a need for additional accommodations due to the individual's disability this will be provided as a disability related cost and will revert to the RS-13 for appropriate sponsorship.
 - 6.1.5 Distribute the completed RS-25 (electronically) to the Financial Aid Office and Business Office; documentation on the RS-25 will remain part of the student's record to prevent over awards.
- 6.2 VASFAA agrees to encourage Virginia Financial Aid Offices to:
 - 6.2.1 Identify single individual contacts at each educational institution regarding disbursement and award notifications issues;
 - 6.2.2 Utilize the RS-25 to communicate with DRS on all mutual consumers/students;
 - 6.2.3 Determine the student's total cost of attendance, inclusive of costs related to a student's disability, once the RS-25 has been received. Financial need shall reflect the difference between total cost of attendance and the expected family contribution (DRS cannot consider EFC for individuals receiving SSI/SSDI);
 - 6.2.4 Adjust the total cost of attendance at any time during the year if there is a change in consumer/student circumstance resulting in an increase in school related disability costs. This will ensure that the school budget and DRS contributions are adjusted accordingly to prevent under awards and over awards;

- 6.2.5 Determine final awards for any grant, scholarship, loan, or work-study offered which will meet the student's financial need, as determined by the Federal Methodology;
- 6.2.6 Notify DRS of final awards, utilizing the RS-25; and
- 6.2.7 Provide a revised RS-25 to DRS any time there is a change in the net remaining need from the original RS-25;
- 6.3 VASFAA agrees to encourage Virginia Financial Aid Offices to comply with this section as enumerated below and DRS agrees to:
 - 6.3.1 Notify each other within ten (10) working days of any changes that occur during the year which would effect individual student budget or the financial aid package, using the RS-25 form;
 - 6.3.2 Be responsible to student needs and involve consumer/student in financial aid negotiations which effect the consumer/student;
 - 6.3.3 Keep each other informed of any changes in programs, policies, and/or procedures which might impact efficient and effective coordination of financial aid support for DRS consumers attending postsecondary educational institutions;
 - 6.3.4 Conduct annual collaborative training programs targeted to Financial Aid Offices and DRS staff to ensure consistent statewide implementation strategies in accordance with responsibilities described herein;
 - 6.3.5 Coordinate as needed, with Special Services Coordinators at postsecondary institutions, to ensure that appropriate services are provided to students with disabilities in an efficient and effective manner.

7.0 SIGNATURES

The undersigned hereby agree to the content of this document and thereby authorize its execution.

James A. Rothrock
Commissioner
Department of Rehabilitative Services



Brenda Burke, President
VA Association of Student
Financial Aid Administrators

