

AN EXAMINATION OF PENNSYLVANIA'S COLLEGE AND TRAINING POLICY
FOR OFFICE OF VOCATIONAL REHABILITATION CLIENTS

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This research paper is a review of the Pennsylvania Office of Vocational Rehabilitation's (OVR) College and Other Post Secondary Training Policies and Guidelines. Specifically, does OVR's policy adequately support the needs of persons with disabilities in obtaining college and other post secondary education?

The purpose of this paper is to review a sufficient body of literature and study to determine if OVR's training policy is supported by available research. According to OVR's 2012 Annual Report, total training services accounted for 46% of case service expenditures.

A lengthy analysis of a large volume of relevant scholarship determined OVR's training policy is supported by available research and that this OVR Policy does support persons with disabilities in post-secondary education. Further examination of the OVR Policy into areas of program funding maximums and the full time attendance requirement may be warranted.

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CHAPTER 1

INTRODUCTION

This research paper is a review of the Pennsylvania Office of Vocational Rehabilitation's (OVR) College and Other Post Secondary Training Policies and Guidelines (OVR-PSTP). Specifically, does OVR's policy adequately support the needs of persons with disabilities in obtaining college and other post secondary education? OVR is part of Pennsylvania's Department of Labor and Industry and is the agency that administers the VR program in the Commonwealth of Pennsylvania as mandated through Federal Law and the Rehabilitation Services Administration (RSA). OVR's 2012 annual report states the agency mission is "to help Pennsylvanians with disabilities secure and maintain employment and independence." (Office of Vocational Rehabilitation, Form No. OVR-624, 2013).

According to OVR's 2012 Annual Report, total training services accounted for 46% of case service expenditures. This is the highest percentage of any OVR category of services, with 91% of overall training funds expended on College and Trade School services (Office of Vocational Rehabilitation, Form No. OVR-624, 2013).

Post secondary education is a service option for appropriate OVR clients. According to Ellis et al. (2010), the International Labour Organisation defines vocational rehabilitation as activities that assist a disabled individual to obtain and maintain appropriate employment. Boutin and Wilson (2009) report that in 2004, the federal Rehabilitation Services Administration (RSA), defined post-secondary education as a Vocational Rehabilitation (VR) service of full time or part time academic training beyond the level of high school that leads to a degree, certificate, or other relevant credentialing.

According to the United States Department of Labor's Bureau of Labor Statistics (USDLS-BLS), in January 2013, the national unemployment rate was 7.9%. In that same month, the unemployment rate for persons with a disability was 13.7%. Furthermore, it reports that as of January 2013, there are more than 22 million people in the United States over the age of 16 that have a disability and are not in the civilian labor force. There are 5.1 million persons with a disability employed nationally as of April January 2013 (United States Department of Labor, 2013).

Kosciulek (2007) researched issues for VR clients in regards to informed consumer choice and quality of life. He reports that people with disabilities are often denied the chance to self direct and control activities of daily living, work, and education. He further states that higher levels of VR consumer choice are related to higher levels of employment outcomes and in order for VR clients to obtain a high quality of life; they must be involved in VR policy and service delivery.

Education and training beyond the high school (secondary) level have been shown to increase a person's earnings. There is significant research and evidence available that shows higher education improves financial opportunities and enhances quality of life (Weikart, 2005; DaDeppo, 2009; Snyder & Dillow, 2012). Flannery, Slovic, Benz, and Levine (2007) indicate that income and wages on average have been declining since the 1970's for persons that have an education level of high school diploma or less. The potential for a person to earn more money by obtaining a post secondary education is a reason for VR to consider this service. According to Rubin (2011), the average costs nationally of college tuition has nearly increased by 300% when adjusted for inflation over several decades.

Snyder and Dillow (2012) reported that in 2010, nationally, 86% of persons age 25-64 that had a bachelor's degree were employed. Of persons age 25-64 with a high school diploma or equivalent, the employment rate was 74%. Also reported for 2010 was that unemployment rates were generally higher for persons that had lower levels of education. People age 25-64 that completed high school had an unemployment rate of 12% and within that same age cohort, those persons with a Bachelor's degree or higher had an unemployment rate of 5%. It was also reported that in 2009, the median annual salary one year after college graduation for all persons receiving a Bachelor's degree was \$37,600. It was also reported that adults with higher levels of education generally earned higher incomes in 2010 than persons with lower education levels (Snyder & Dillow, 2012).

Post secondary education can lead to stable employment opportunities. This was reported by Madaus (2006) in his research of recent graduates with learning disabilities (LD) from three American based universities. He found that the employment rate for persons with a learning disability (LD) that graduated college or university was 88%, with 75% of research respondents reporting full time employment. The overall employment outcomes in the areas of employment rate and average earnings for university graduates with LD are comparable to university graduates that do not have LD. (Madaus, 2006).

Furthermore, Madaus (2006) found that unemployment rates for persons with LD that graduated the universities were comparable to rates of unemployment by non-disabled persons that were university graduates. Madaus (2006) cites that in his study, the two main reasons respondents gave for unemployment were child rearing or attending

further education and training. Madaus' (2006) research shows that a college degree can positively impact vocational goal attainment for persons with a learning disability.

Boutin and Wilson's (2009) research analysis into persons with hearing impairments that received the VR services of college and university training had some positive findings. It was reported that post-secondary training is a vocational rehabilitation service that can be of great importance to successfully meeting IPE goals.

The National Council on Disability strongly encourages the opportunity for persons with disabilities to have access to post-secondary education as a mechanism to increase economic opportunity and independence (Shaw, Madaus & Banerjee, 2009).

Persons with disabilities that attend a post-secondary training program and the institution that offers the training have rights and responsibilities under Section 504 of the Rehabilitation Act of 1973 (hereafter referred to as "Section 504") and the Americans with Disabilities Act (ADA) according to the National Joint Committee on Learning Disabilities (1999).

Reasonable accommodations, for the purpose of post-secondary education, can be defined as a modification to the program that allows for a person with a disability to enter and participate in post-secondary education to the same extent as a non-disabled person ("Three Formulations of the Nexus," 2013). Although the definition of reasonable accommodations as set forth in Section 504 and ADA are reasonably clear, the intent, methods, and variances in service provision at the post-secondary level can be extensive. Full integration into the general college population for students with disabilities is one of the intentions and purpose of Section 504 and the ADA (Lombardi & Murray, 2011; DaDeppo, 2009; Birdwell & Fonosch, 1980).

The OVR Pittsburgh District Office is one of 15 statewide VR district offices. Each district office is assigned a coverage area that utilizes county borders. Generally speaking, OVR Districts in rural areas cover multiple counties over a wide geographic area, while districts in urban or high population areas cover a smaller geographic area. From an organizational perspective, each OVR Office has a District Administrator (DA) that oversees the office's day to day operations and VR program implementation.

Each OVR District Office has a compliment of VR Counselors. VR Counselors have a high level of autonomy in providing client services. The VR Counselor works directly with the client in evaluating program and service options that best meet the VR clients' needs from the standpoint of achieving the vocational goal.

The primary source of funding comes from the federal level through the Rehabilitation Services Administration (RSA). Pennsylvania OVR must match the funding amounts from RSA at an 80/20 ratio. This means that for each \$80 of federal funds, Pennsylvania must match it with \$20 in state funding. The OVR fiscal year follows the federal fiscal year in that it begins October 1st each year and concludes September 30th of the following year.

Marci Katona, the District Administrator of the OVR Pittsburgh District Office, discussed that the agency has a responsibility to remain aware of service provision. A memorandum of agreement (MOU) between OVR and the vendor is initially completed at the time of vendor approval. Colleges, Universities, and almost all other post-secondary schools that award degrees in Pennsylvania have MOU's developed with the OVR Central Office.

VR Supervisor Huey stated that two structured mechanisms for agency review of client service delivery is the annual OVR public hearing and annual performance reviews of OVR employees. The public hearing allows for clients and any stakeholders in the community to raise issues that are important to OVR continuing to evaluate and improve services. Employee performance reviews provide the opportunity to assess employees' goals and expectations. Equally important in both of these mechanisms is the chance for the agency to evaluate how it is performing with regards to feedback from clients, employees and other community partners.

Ms. Katona also mentioned, and Mr. Huey concurred, that the Pittsburgh OVR District strives to be open and aware of client and employee needs and areas for improvement on a daily basis. This can occur through direct one-on-one client contact, weekly supervisors' meetings, an "open door" approach with employees and a concerted effort towards awareness of OVR mission. OVR is client centered and recognizes that in order for the client to be successful; various stakeholders will need to be involved in the VR process. The client is the primary stakeholder in any VR case.

Each year, the OVR Statewide Agency compiles a State Plan for approval to the OVR Statewide Executive Board and eventual submission to RSA (*OVR, 2012 Combined Agency State Plan*). The state plan outlines what the OVR Statewide program's responsibilities are along with reporting on the latest developments within the agency, how objectives are defined and met, and how future issues will continue to impact on the accomplishment of the mission.

OVR is tasked with serving clients that are Most Severely Disabled and assisting those clients in obtaining employment in an integrated community setting. At the end of

the fiscal year, OVR reports the total number of VR clients that achieve a successful vocational outcome. For the fiscal year ending 9/30/12, OVR statewide assisted 9,924 VR clients achieving an IPE job goal. These numbers exceeded the RSA approved goal for the 2012 Federal Fiscal year.

However this number in and of itself is not sufficient as a Key Performance Indicator (KPI). Therefore OVR gathers and reports other information in order to determine KPIs that measure outcomes such as average salary and wages of clients in competitive employment, the average number of hours worked to determine if full time or part time jobs are being obtained, and if the successful employment offers employer paid medical benefits. These KPIs allow OVR to better assess the overall effectiveness of the Agency in providing a benefit to the community at large.

Pennsylvania OVR is established for the sole purpose of serving VR clients with employment and employment related services. Although this is a clear mission statement and a singular purpose, the proper implementation for desired outcomes requires an agency established to achieve the mission of serving VR clients.

OVR does not work exclusively or inclusively of any particular disabling condition. Clients with cognitive or physical disabilities, disabilities that are congenital or the result of an accident or injury are all potential OVR clients. OVR must consider the severity of disability and the functional limitations the disability presents. (Of note: Pennsylvania OVR clients that present with a primary disability that affects vision, such as blindness, receive their OVR services through a separate entity within OVR, the Bureau of Blindness and Visual Services).

According to OVR's statewide annual report from 2012, over 88,000 clients received OVR services in Pennsylvania in from 10/1/11 through 9/30/12. OVR reports that of the more than 9,000 clients that achieved a successful vocational outcome in competitive employment, earnings on average increased by 100% after receiving the rehabilitation services from OVR. (Office of Vocational Rehabilitation, Form No. OVR-624, 2012).

OVR approaches services from the standpoint of service options and informed client choice. This approach is in line with national standards established by RSA in 1992 with the Reauthorization of the Rehabilitation Act (Wolf-Branigan, Daeschlein, Cardinal, & Twiss 2000).

OVR Management has a responsibility to implement the VR program and utilize the funding and resources so that a maximum number of most severely disabled clients can receive services. When evaluating client needs and services, OVR Staff keeps in mind how the service will support the client's IPE and successful vocational outcome.

The 2012 OVR Annual Report contains information for the fiscal year 10/1/11-9/30/12. Statewide throughout Pennsylvania, OVR had an operating budget of \$156,637,783 for VR Field Operations.

Marci Katona, the District Director of the OVR Pittsburgh District Office, stated that in the 2012 Fiscal Year, the OVR Pittsburgh District Office spent approximately \$11 million in purchasing direct client services.

OVR's College and Other Post Secondary Policy was most recently changed in December 2012 and became effective for all OVR clients that would be new students in

post-secondary education as of the 2013-2014 academic year. For ongoing students, the previous OVR-PSTP remained in effect while they completed their IPE training services.

This research paper is reviewing the new OVR College and Other Post Secondary Policy. Although the "old policy" remains in effect for some clients, the new policy is what will be impacting the agency and all new stakeholders this 2013-2014 academic year and future academic years.

In order for OVR to consider paying for cost services (other than evaluations), the OVR client must meet financial eligibility requirements. For post-secondary training services, OVR has established formulas and calculations to determine the financial eligibility. The new OVR College and Other Post Secondary Policy made some changes to how these formulas were calculated and what information is to be considered. Under the new College and Other Post Secondary Policy, if an OVR client attends any college or university, funding eligibility is determined by totaling up the actual tuition and fees, a maximum consideration of \$500 in book and supply costs, along with transportation costs if the client commutes to school. Room and board costs are not considered during the OVR clients' freshman and sophomore years if a Community College is located within 50 miles of the clients' residence. If a Community College is not located within 50 miles of the clients' residence, then room and board costs can be considered in the first two years of college. In the clients' junior and senior years of college, room and board costs can be considered if the client lives on campus. The location of a Community College within 50 miles is not relevant in the clients' junior or senior years.

OVR totals up the tuition, fees, capped book costs of \$500, and transportation or room and board costs and the total amount is what OVR considers the client's training

costs for an academic year. Then, the total amount of all state and federal grants, third party scholarships, institutional aid, and the Expected Family Contribution (EFC) as determined by FAFSA is added up. If the costs of grants/aid/EFC exceeds school costs, then OVR does not authorize any funds or pay towards training costs as the costs are all covered by grants, scholarships and the client's own financial responsibility. This would be referred to as a "no cost" case for that academic year.

If the total costs of tuition, fees, books, supplies and room and board (or transportation) are more than the amount of grants, aid, and EFC, then OVR will pay the amount of uncovered difference up to the college funding maximum. OVR College and Other Post Secondary Policy sets the college and university funding maximum to be the average cost of tuition and fees among the 14 Community Colleges located throughout Pennsylvania. That average cost for the 2013/2014 academic year is \$4,620 for a full time student. The old college policy had a maximum funding cost at \$5,000 per academic year and the actual costs of books were considered.

There are some variations within these calculations that are relevant to whether or not a client receives SSI or SSDI due the client's disability. OVR College and Other Post Secondary Policy excludes the EFC for SSI and SSDI recipients in funding eligibility calculations. Also, during the clients' junior and senior years, OVR increases the maximum funding for an academic year to the average costs of the 14 school Pennsylvania State System of Higher Education (SSHE). That amount currently stands at \$9,420. However, OVR only considers college costs up to \$9,420 for commuter students (\$17,180 if the client resides on campus) for client's receiving SSI/SSDI in years three and four. Therefore, it would be entirely possible for an OVR client that receives

SSI/SSDI to be eligible for funding from OVR as freshman and sophomores, then not be eligible for OVR funding as juniors and seniors. This will be explored further in the Discussion and Summary portions of the paper.

OVR-PSTP also requires the client attend school full time each semester. Twelve or more credits per semester generally constitute full time attendance. OVR-PSTP also requires that in order for OVR funding to continue to the next semester, the client must maintain a cumulative Grade Point Average (GPA) at or above 2.0. If the clients' school or major course of study requires a higher GPA, than that higher GPA must be maintained each semester by the OVR client.

OVR-PSTP uses a modified calculation for funding of a student that attends a Post-Secondary Business Trade or Technical School (BTT). Many BTT's in Pennsylvania offer and award associate degree programs. But nonetheless, OVR-PSTP still uses some different calculations. It bears some similarities and notable differences with the College calculations. Tuition, fees, books/supplies and transportation (or room and board) are added up to obtain a total cost. Notable here is that actual book and supply costs are used (no cap of \$500) and transportation or room and boards costs are used without any regards for the location of a Community College within 50 miles. Also relevant in the BTT funding calculations is that the EFC is not used. Rather, OVR uses what is called the Financial Needs Test (FNT). The FNT is computed annually by the VR Counselor reviewing the clients' and the clients' family's adjusted gross income (AGI) from the 1040 Federal Tax return. The FNT is computed by reducing AGI by \$33,000, then reducing an additional \$3,820 per dependent. After those deductions are made, OVR computes 10% of the final amount and that is the FNT for the client. The

FNT is almost always less than the EFC. For clients that receive SSI/SSDI, the FNT is excluded from BTT funding calculations the same way the EFC is excluded from College funding calculations.

OVR BTT funding maximums and calculations under the new OVR-PSTP did not change in any way from the previous OVR-PSTP. The current maximum of OVR funding for a client's academic year at a BTT school is \$5,500. This is the maximum for all OVR clients, regardless of whether or not they receive SSI/SSDI. OVR clients' at BTT must meet the OVR-PSTP guidelines of a minimum 2.0 or better GPA and also must be full-time students.

All OVR clients' seeking post-secondary training must complete the Free Application for Federal Student Aid (FAFSA) each year and first utilize all available Pell and Pennsylvania Higher Education Assistance Agency (PHEAA) grants and other similar grants and benefits before OVR will consider paying towards post-secondary training costs. OVR never requires a client to apply for or obtain loans, nor does OVR factor loans or loan information into calculations for funding eligibility. OVR does however have a provision in the OVR-PSTP regarding a client that has defaulted on student loans. OVR will not consider post-secondary costs if a client is in default. The client must obtain written clearance from the National Student Loan Data System (NSLDS) before OVR will consider authorizing training funds. One of the primary purposes of the FAFSA is to determine the levels of financial need for a student attending a post-secondary school and how to distribute a finite amount of government funds towards this goal (Long, 2010).

CHAPTER 2

DISCUSSION

In order to examine OVR-PSTP, research into some aspects of two neighboring state VR programs, West Virginia and Ohio, was explored.

West Virginia's Department of Education and the Arts, Division of Rehabilitation Services (WVDRS) defines post secondary training as a program that has an established curriculum, formal classroom instruction, the school publishes a course catalog, awards degrees or certifications and issues grades on a term basis. In order to receive college funding support, WVDRS clients must have an Individualized Plan for Employment (IPE). Post-secondary training services under the IPE are limited to training that will allow the client the opportunity to gain minimum needed skills for entry level job requirements of the clients' IPE goal. WVDRS best practice is for the VR client and VR Counselor to consider the availability of specific jobs in clients' residential area and the long-term outlook and viability for the job goal to offer the VR client some security and stability. Training should not be a service if the clients' primary goal is to increase income at their current job (WVDRS, 2009).

WVDRS states in their Training Services Manual that post-secondary training providers should be accredited and approved institutions with state Boards of Education, Accrediting Bodies, Authorities, or Trade Groups. WVDRS sets maximum training funding rates at the rate of tuition and fees at the two in state public universities, West Virginia University and Marshall University. WVDRS only allows for payment of classes taken during the summer (outside of the traditional fall/spring semester academic year) with approval at the Management/Administrator level. This is similar to

Pennsylvania's policy too. OVR-PSTP not allow for funding to be considered at college during the summer, unless the training program specifically runs year round and mandates the client attend classes in summer as part of regular program curriculum. WVDRS clients are encouraged to attend training programs located in the state of West Virginia when the major course of study is offered at an in state post-secondary school. If a client elects to attend school out of state, there is no change to the WVDRS training maximums.

One interesting fact that WVDRS outlined is that West Virginia is part of a 16 state Academic Common Market. The 16 states in this Academic Common Market have reciprocal agreements that offer students from out of state the in-state rate for a public post secondary school when the students' home state does not have a public college or university that offers the academic program major that the student wishes to pursue. This is open to all post-secondary schools and not exclusive to students with a disability or some limited population of students.

One aspect of OVR-PSTP bears some similarities with this. As discussed in Chapter 1, OVR-PSTP does have some specific provisions that pertain only to VR clients that receive SSI/SSDI. One such provision is that if a student wants to pursue a major course of study and that major course of study is not offered at one of the Pennsylvania SSHE schools, then OVR will consider the actual costs of the college or university that offers the academic program major. Although this occurrence would be rare, it would allow the VR client that receives SSI/SSDI to have the cap removed on considered costs of the SSHE tuition average when calculating OVR funding eligibility.

Similar to Pennsylvania, WVDRS will not assist with post-secondary training costs if the client is in default status on student loans. Also similar is that WVDRS exempts recipients of SSI/DI from economic based needs testing in training funding formulas. Based on WVDRS's description of its funding formulas, they seem comparable to Pennsylvania's where available grants and scholarships are deducted from tuition and fees to determine if any uncovered costs remain for the state VR agency to consider funding.

The State of Ohio's Opportunities for Ohioans with Disabilities (OOD) is the state agency that provides vocational rehabilitation services to eligible clients. OOD has a "Consumer Guide to Post-secondary Educational Training" that informs on relevant state VR policy for clients (OOD, 2011). The state of Ohio has rates of high school graduates entering a public college or university at rates comparable to the national average. Students taking remedial college courses in reading, writing, and arithmetic are in proximity to national averages as well (Bettinger & Long, 2005).

The OOD does support post-secondary training funding at universities, colleges, tech schools and other programs. Similar to Pennsylvania and West Virginia, OOD does not fund clients that are in default of student loans, does not fund summer classes unless approved by an OOD Administrator, does not require SSI & SSDI recipients to be needs tested on income for services. Post-secondary training programs where clients attend should be appropriately accredited.

OOD requires their clients complete an FAFSA each year for Pell and other grant eligibility and it appears that OOD uses formulas similar to Pennsylvania and West

Virginia that accounts for school costs then subtracts awarded grants to determine unmet need and funding eligibility.

OOD requires that students maintain a “C average” GPA or higher and if the specific program major course of study mandates higher GPA, then OOD requires clients to meet that higher GPA as part of funding eligibility.

Ohio appears to have some very similar policies with Pennsylvania regarding funding calculations in years 1 and 2 being different than in years 3 and 4. Specifically, OOD follows a least-cost principal that caps costs for the client’s freshman and sophomore years at the rate of lowest Ohio public two year college. As in Pennsylvania, OOD clients do not have to attend the 2 year public college (community college) in their freshman or sophomore years, but the maximum OOD funding will not exceed what it establishes as maximums based on 2 year public colleges.

OOD does increase its funding maximum in the junior and senior years while still following a least cost principal. More specifically, the OOD funding maximums in years 3 and 4 are expanded to the least expensive costs of Ohio’s 4 year public colleges and universities. Although Pennsylvania OVR does not change funding maximums for VR clients that are not SSI/SSDI recipients in years three and four, OVR does allow for room and board costs to be considered, thus allowing a junior or senior client to have more of their actual college costs considered by PA OVR.

OOD’s Consumer Guide outlines some training provisions for IPE planning similar to West Virginia and Pennsylvania. Post-secondary education cost services should only be part of the IPE after a thorough assessment between the VR Counselor and VR client shows that the client’s education is needed for the job goal and that the job

market outlook is viable where the VR client plans on residing and working after post-secondary training is completed.

Further similarities regarding best practices in completing the secondary education program exist in OOD and OVR. OOD states that for the purposes of determining how a client is progressing, that each academic year should be completed within a consecutive 18 month time frame. Pennsylvania OVR's College and Other Post Secondary Policy states that VR clients should complete their training program within the normal program length. Pennsylvania OVR is not directly time limited in this regard. It does not mean that a client must complete a four year college program in four years (or 8 semesters) from the time the client enters the post-secondary training program. However it does mean that OVR clients should not be considered for more than 8 semesters of total funding as the normal program length is 8 semesters. Later in this chapter, specific research will be cited that may contradict this as good policy, or at the least, be worth considering when individual client services are being developed with clients and their IPE.

OOD indicates that if a client fails a class or needs to repeat coursework that is not sufficient reason to extend OOD funding to the client without a further examination of circumstances and a possible approval at OOD Administrative level. OVR-PSTP states that courses repeated should not be considered for funding by OVR.

All State VR programs in the United States are allowed to authorize funds towards costs of post-secondary training for an eligible VR Client according to rules and regulations of the federal Rehabilitation Services Administration. However, when it comes to specific VR service provision of post-secondary schools, it can vary greatly

from State to State in how or if this service is authorized. Some state VR programs pay for all post-secondary education costs, while others pay a portion or establish maximums that require the VR client to pay part of the post-secondary school costs. Other states restrict attendance only to state schools and public universities in order for a VR client to obtain cost services for post-secondary education (Miller, O'Mara, & Getzel, 2009).

CHAPTER 3

LEARNING SUPPORTS AND ACCOMODATIONS

As discussed in Chapter 1, reasonable accommodations and learning supports are meant to allow for students with disabilities access to post-secondary education. Studies have shown that students with disabilities in post-secondary education demonstrated their ability to focus on goals and achieve success (NJCLD, 1999).

Supports and accommodations for disability at the high school level are often developed through a transition plan. The Individuals with Disabilities Education Act (IDEA) is the federal legislation that most impacts high school transition planning from the national level. Amendments to IDEA have sought to further increase direct involvement from the high student with a disability in their transition planning (Field, Sarver, & Shaw, 2003; DaDeppo, 2009). Encouraging this type of student involvement in HS is positive according to the authors, but the fact that IDEA has no legal standing at the post-secondary school level may somewhat mitigate the positive impact because the student will encounter a different set of rules, regulations, and policies, not to mention increased expectations, when enrolling and attending post-secondary school. Doren, Gau, and Lindstrom (2012) recommend part of the students' high school transition plan to include an adult mentor to assist in positive expectations.

IDEA has also been amended to re-define post school outcomes to include post-secondary education and vocational training (Wilson, Hoffman, & McLaughlin, 2009).

There has been an increase in college enrollment of students with disabilities in recent decades. Currently, about 9% of total post-secondary school enrollment in the United States is comprised of students with a reported disability (Murray and Lombardi,

2011). Students that enter post-secondary schools after they graduate high school might find that the learning supports and accommodations at college are different than high school. A high school student with a disability receiving supports might have individual instruction in class along with modification of educational demands, structures, and environments (Lombardi & Murray, 2011). These high school level supports may have been developed with a transition team comprised of special education teachers, guidance counselors, parents, social workers, VR Counselors and the school principal. In college, the student with a disability must self-report and then very often self-advocate for supportive services. Furthermore, these services are likely to be different in purpose and scope than the high school supports (Lombardi & Murray, 2011).

Due to the differences in supports at high school compared to post-secondary school, Shaw, Madaus & Banerjee (2009) offer two suggestions to assist students with disabilities transitioning to post-secondary schools. One suggestion is that services in high school might better serve students with disabilities to prepare for college by having the students enroll in classes that are academically rigorous. The other suggestion is to minimize, as much as possible, course substitutions in high school because course substitutions are extremely rare in college and post-secondary training.

Employment outcomes for youth with disabilities present challenges. A heavy emphasis has been placed on programs, transition services, and research that focus on life skills, family advocacy & support, and on the job training. These efforts are frequently associated with independent living and employability after high school more so than post secondary education (Wilson et al. 2009). Wilson, Hoffman, and McLaughlin (2009) state that research has shown two significant factors when assessing the likelihood of any

youths to enroll in college are the youths' setting college attendance as a goal and completing a high school curriculum that is focused on preparation for college.

According to Wilson et al. (2009), transition research conducted by the National Longitudinal Transition Study (NLTS2) that began in the year 2000 indicates that involving the students in their own IEP development, goal setting and other transition decisions can support efforts to increase the likelihood of college enrollment.

Doren, Gau, and Lindstrom (2012) found a significant correlation between a parent having expectations for the high school student with a disability and the student actually attending or having completed a post-secondary education.

Wilson et al. (2009) report findings on high school students with a disability that plan on attending a two or four year college compared with high school students that do not have a disability and plan on attending college. Students without a disability were more likely to have higher level math courses, have a higher GPA, and more likely to be on a college preparatory curriculum in high school. A correlation in GPA and college plans was also reported. Specifically, students with a lower GPA were less likely to plan to attend college than non-disabled students with a similar GPA. A similar correlation in college planning was found in students with a disability and a higher GPA when compared with non-disabled students of a comparable GPA.

Wilson et al. (2009) report findings that support a positive correlation in advanced high school mathematic coursework with plans to attend college for students with disabilities and that high school students with disabilities are more likely to maintain a plan to attend college when those plans are formulated during the 10th and 12th grade levels of high school.

Heiman and Kariv (2004) studied coping mechanisms and behaviors as reported by a cohort of adult students (ages 23-45) with learning disabilities enrolled at a distance learning program through the Open University of Israel. The students in this research reported that they received more one-on-one help in high school when compared to college.

A study conducted in Australia researched issues and barriers for post-secondary students with learning disabilities in accessing supports in a timely manner. Ryan (2007) stated that in Australia, post-secondary schools are required to provide support services to students with disabilities. Students reported they were often confronted with support services and class instructors that were two completely separate entities. An example was that class instructors were often reluctant to address students concerns or requests because the instructors assumed that all of these accommodations were being handled by the supportive services office. With very little coordination between learning supports and the class instructors, students with LD reported difficulties in fully accessing extra time for exams, copies of lecture notes from instructors or additional tutoring from the instructor (Ryan, 2007).

Another research study from Australia examined issues encountered by university students with disabilities that required alternative formats for written materials. This included students with visual disabilities and reading disabilities. Students with functional limitations in reading printed materials may need accommodations where the book is converted to a screen reader, screen magnifier or auditory format. Considering that the methods for converting printed materials can be labor intensive and require significant time to convert the format, Harpur and Loudoun (2011) found that students in

this population where often at risk of falling behind because their alternative format reading materials were not ready at the start of the semester. This additional hardship for students could come about in different ways. Sometimes the books were not available until the start of the semester, so the conversion process would not start until after classes began. University Libraries at times would have to check on copyright laws and obtain legal clearance to copy or scan an entire book. When a book was scanned into a PDF format, the essential meaning of the authors' writing could be lost due to the PDF or screen readers unable to recognize italicized or bold content. Even navigating the book in alternate format could prove challenging as accessing chapters, appendixes, and glossaries were changed from the bound and printed material (Harpur & Loudoun, 2011). The authors correctly state that when post-secondary schools offer accommodations to students with disabilities that the utility and feasibility of the accommodations should also be considered.

In the United States, copyright issues in these scenarios can be addressed by the Association of American Publishers and the look up service that this Association provides. Harpur and Loudoun (2011) report that this look-up service is available to post-secondary school's supportive services office so that if a copyright related issue comes up, the supportive services office has a contact at the publishing house to answer and advise on the copyright issue. The publishing house can directly assist the post secondary school with matters such as requesting electronic formats or permission to scan materials so that no copyright law is violated and to obtain the publishers approval if needed.

Considering that students with disabilities are confronted with challenges at the post-secondary level, it is worthwhile to review available research on pro-active methods being explored and implemented in the area of supportive services and accommodations. One such initiative is Ball State University's Faculty Mentorship Program (FMP). According to Harris, Ho, Markle and Wessel (2011) the FMP at Ball State was created around 2004 with the goal of bringing together students with disabilities and a faculty member from the students' major course of study.

Students in post-secondary schools that engage with faculty outside of the classroom have been shown to achieve higher GPAs, report greater satisfaction with their education and show higher rates of remaining enrolled in school. When this rapport with faculty is established in the student's freshman year it can yield additional benefits such as a better understanding of academic rigors, institutional expectations and social growth and awareness (Harris, Ho, Markle, & Wessel, 2011).

The FMP is open to all new students each year that report a disability to the university's Supportive Services Office and the Supportive Services Office facilitates the FMP ongoing. When the FMP was first introduced, different academic departments at the university recruited their faculty that earned a positive reputation within the department or university community as being acutely aware, open-minded, or experienced in reasonable accommodations for students with disabilities (Harris et al., 2011).

FMP Directors assign faculty and students for one-on-one mentorship and arrange for the initial meeting to outline expectations and objectives to both student and faculty member. From there, the one-on-one meetings, topics, and formats are left to the FMP

participants to develop and expand as best fits the student and faculty mentor. Although the flexibility remains, FMP does expect the one-on-one meetings to occur with regularity so that the student's ability to navigate and adjust to the complexities of university life can be maximized (Harris et al., 2011).

One of the observed benefits of the FMP according to Harris et al. (2011) has been networking opportunities that the student may experience by becoming familiar with the faculty mentor's academic program department. It is possible that within the department unique services, learning methods and other academic or career specific opportunities may be made available to the student. FMP faculty has participated in workshops and staffings that allowed additional skills to be learned and broadened to help all students in the classroom. In the first five years, the FMP students had higher GPAs on average than non FMP participants and the FMP students also had higher rates of enrollment retention (Harris et al., 2011).

As Chapter 3 illustrates, the levels of support at post-secondary schools can vary. Even though schools are offering supports, the needs of the individual student should be considered. Balancing the legal requirements to offer accommodations with the realities that students may be uncertain of how to properly self disclose and self advocate for reasonable accommodations should be of high priority to OVR Counselors that are assisting a person in post-secondary education.

Post-secondary schools are not allowed to charge a fee or additional costs to students for reasonable accommodations that allows for equal access to classes and curriculum (Shaw, Madaus, & Banerjee, 2009). Nonetheless, considering that the variation in supports clearly exists, The Pennsylvania OVR College and Other Post

Secondary Policy does allow for paying additional costs should a client need services beyond what the school must offer as a reasonable accommodation. One example is sign language interpreter services for a student that is deaf. According to Pittsburgh OVR District Administrator Marci Katona, OVR's policy on this service is to split the costs in half between the post-secondary school and OVR, with each paying 50% of the interpreter fees.

Other supportive services such as attendant care, transportation, and evaluations for assistive technology can be considered by OVR. These costs are not subject to the maximum payment amounts as outlined in the Pennsylvania OVR College and Other Post Secondary Training Policy and are reviewed and determined separate from the calculations used to determine eligible funding for tuition, fees, books and supplies at post-secondary school.

For a student with a physical disability that presents ambulatory issues accommodations may be in an area outside of learning supports. Post-secondary institutions that provide students who have physical disabilities reasonable accommodations can increase the students' opportunity for full participation in academic and student life. A post-secondary school should have fully accessible facilities and VR Clients and VR Counselors might want to consider how well the school allows for access to the library, dining halls, recreation centers and faculty offices as indicators when considering how accessible the campus is (Birdwell & Fonosch, 1980).

CHAPTER 4

FUNDING AND FINANCIAL CONSIDERATIONS

As outlined in the Pennsylvania OVR College and Other Post Secondary Training Policy, providing for financial support to VR clients to attend post-secondary training is a valid service. The policy outlines how funding is determined and awarded. Once an Individualized Plan for Employment (IPE) that includes attending post-secondary training as a service, the VR Counselor would then follow the appropriate procedures for obtaining information from the post-secondary school, reviewing that information and then authorizing funds for financially eligible clients. Per OVR-PSTP, regardless of the clients' year in school, major course of study, disability, or if the client receives SSI or SSDI, certain specific information must be provided by the post-secondary school. This would include the amount of tuition, fees, books, supplies and the Pell grant, the Pennsylvania Higher Education Assistance Agency (PHEAA) grant and any other third party grants or scholarships. If the post-secondary school is a college the Expected Family Contribution (EFC) would also be obtained. OVR also asks the school to verify that the client is not in default of student loans and that the client is maintaining academic progress at the school.

In order for OVR to consider costs for post-secondary education, the VR client must complete the Free Application for Federal Student Aid (FAFSA). The FAFSA will determine eligibility for any Pell or Pheaa grants along with determining clients' EFC. These figures are integral in the OVR funding determination.

It is common practice among state aid programs (such as Pheaa) and other third party aid programs to base eligibility for funding using information determined by the

FAFSA (Rubin, 2011; Miller, O'Mara, & Getzel, 2009). It also seems to be a good practice that OVR informs clients on the FAFSA and requires the filing of the FAFSA to be completed each year. Long (2010) found a direct correlation between the likelihood of filing the FAFSA and the student having received assistance and information about the FAFSA and other financial aid. Community College students in California that had a greater knowledge of the FAFSA were more likely to file the FAFSA earlier, which increases access to Pell grants, state grants and other third party financial aid (McKinney & Novak, 2013).

As discussed, OVR uses the EFC as part of the funding eligibility calculations. When the EFC is used as part of the determination of aid or grant eligibility this is referred to as the Federal Methodology. The EFC is determined by FAFSA that includes factors such as the students and parents' annual income and assets, the number of people in the household, and the number of family members enrolled in a post-secondary training program (Rubin, 2011).

Pell grants, which are not a loan, are awarded to students whose EFC is at or below a set maximum. The lower the EFC, the higher the Pell grants up to the annual maximum. The EFC is determined each academic year and EFCs can increase or decrease depending on the factors mentioned above.

OVR's requirement to complete the FAFSA is further bolstered by the fact that in 2007-2008, 42% of community college students that did not file a FAFSA would have been eligible for some Pell grants had they filed the FAFSA (McKinney & Novak, 2013).

According to OVR Supervisor Terry Huey, for the current 2013-2014 academic year, the maximum Pell grant is \$5645 and the maximum Pheaa grant is \$4362.

In 2008-2009, state and federal governments allocated over \$2.5 trillion dollars in the form of post-secondary student grants. Post-secondary education benefits an individual person as well as the public at large. Increases to the tax base through higher earnings and increased knowledge leading to better decisions related to a person's health are two examples of benefits to the public at large. People that have a post-secondary education are less likely to be unemployed (Long, 2010).

Pennsylvania OVR's College and Other Post Secondary Training Policy has established a maximum funding amount of \$4,620 for colleges and \$5,500 for Business trade or technical schools for the academic year 2013-2014. The OVR-PSTP bases the \$4,620 on the average cost to attend a community college in Pennsylvania. Long (2010) reports that for the 2009-10 school year, the national average cost for tuition and fees at a community college was \$2,544. However, in a previous study that considered the costs of college on students that were dependents on their parent(s) income, Long (2010) found that in 2003-04, after the Expected Family Contribution was considered along with all grant awards that, on average, students still had unmet costs of \$7,195.

The Institute for College Access & Success (2009) reports that nationally, approximately 2.2 million students attend Community College full time. This represents about 24% of all full time students nationwide enrolled in an undergraduate program.

OVR's using the average costs of Community Colleges statewide seems to have merit when considering that students at community colleges were found to be much less likely to take out federal loans such as the Stafford Loan, in 2007-2008, than their counterparts at four year public and private schools (The Institute for College Access & Success, 2009). Although OVR is not involved in the loan process for students, by

allowing for OVR maximum funding to be at the Community College average, OVR's policy is somewhat supportive of helping students to minimize having to take loans if they elect to attend a community college.

According to The Hamilton Project (February, 2007), a potential problem for all post-secondary students seeking Federal financial aid can be found in the FAFSA process. Students and families oftentimes do not know what their Pell Grant and Subsidized loan eligibility will be until well after the application period for college. Students and families found not eligible for Title IV Federal funds may be able to count education costs as tax credits when filing an income tax return. However, the financial benefit of educational tax credits may not be realized by the student and family until a year and half after a student had enrolled in school and paid college costs.

Increased costs in post-secondary education are a concern for students and their families. Federal Pell grants and subsidized loans are meant to assist middle and low income families with paying towards the cost of post-secondary education. Studies have shown that a college education is a good return on investment. On average, a person with a bachelor's degree or higher degree can expect to earn \$440,000 more than a person without any college degree (The Hamilton Project, February, 2007).

OVR should be aware that the FAFSA application process is complex and time consuming for families and post-secondary schools. Currently, the FAFSA has 127 questions that must be addressed by the applicant. Research has shown that programs offering aid for post-secondary students is most effective when the aid application process or program is simple and the information and eligibility determination is made

early in the process of a student planning for post-secondary education (The Hamilton Project February, 2007).

Long (2010) concurs with this and states that accessing post-secondary financial assistance programs such as FAFSA can be a difficult process for a student and their family. Even though these challenges in accessing financial aid exist, there is a significant body of research indicating that financial aid and its availability can impact a student's decision to attend a post-secondary school.

CHAPTER 5

ACADEMIC PROGRESS AND PROGRAM COMPLETION

The Pennsylvania OVR College and Other Post Secondary Training Policy requires that a student attend school full time in order for OVR to consider funding. OVR college policy also requires a student maintain a minimum cumulative grade point average (GPA) at or above 2.0.

It is common for State VR agencies to establish GPA requirements that VR clients must meet or exceed in order for funding of post-secondary education from the State VR agency to continue (Miller, O'Mara, & Getzel, 2009). Considering the importance of GPA relevant to OVR funding, VR Counselors may want to strongly emphasize or possibly even add to the IPE that the VR client will actively seek out assistance from faculty and meet with instructors during office hours. According to Murray and Wren (2003), college students with learning disabilities that sought out extra help from their instructors reported having better GPAs and an overall positive outlook on their education.

DaDeppo (2009) points out that research has shown that a persons' High School GPA and SAT or ACT scores are not reliable predictors of post-secondary academic performance as measured by the GPA. DaDeppo's (2009) own research found that post-secondary students who had opportunities to integrate into the social and academic setting of their school may show greater levels of persistence, intent to persist, and better GPA's.

Social integration factors, as researched by DaDeppo (2009), could include a student residing on campus. Since OVR will not consider any costs for a first or second

year students' room and board to reside on campus it might be reasonable when the students' GPA is evaluated by OVR to consider that OVR did not give much support or an option to reside on campus. When relevant factors along the lines of social integration impacting an individual VR client's GPA are considered, the fact that the client was not given the option to reside on campus might be considered or further examined within the ongoing VR services per IPE. It might be necessary to consider the option of residing on campus to be a social integration factor that may assist the VR client in having success in post-secondary education.

Among lower income students that file a FAFSA, there are higher rates of persistence in post-secondary education for these students. Furthermore, research has shown an overall positive correlation in community college students that are receiving financial aid based on their income and these students having a high level of persistence in completing their college program. Persistence is defined as students remaining enrolled for a second semester (McKinney & Novak, 2013).

Although OVR does not cap the total amount that can be funded to a client over the entire length of the program, the OVR policy does state that funding should not exceed what the normal program completion time frame is. That would mean that if a client were to enroll in a program that is 8 semesters (4 years) in length, OVR should not fund more than 8 semesters, even if the client ends up having to take additional semesters to graduate or successfully complete the program.

This raises some legitimate issues on OVR's expectations for clients. Remedial courses almost never count towards degree completion for a post-secondary school. This can result in students that need to take remedial courses being faced with higher overall

college costs and require a longer time frame to graduate. It could also impact financial aid eligibility that is time limited (Bettinger & Long, 2005).

The U.S. Dept. of Education reports that over 40% of community college students in their first year take remedial courses. The main intent of remedial courses at the post-secondary level is designed to assist students lacking in some areas of academic knowledge to prepare them to be successful in post-secondary education (Bettinger & Long, 2005).

Students with a learning disability reported attending college part-time as a coping method to allow for extra time needed to complete class assignments, readings, and test preparation. Students over the age of 23 with LD who were able to choose their course of study and the pace of that study reported more positive experiences at college (Heiman & Kariv, 2004).

A study by Downey, Snyder, and Hill (2000) examined college students with an LD and the requirement for a foreign language class as part of a college curriculum from the standpoint of a modified program at the University of Colorado. Research has found that students with LD may be challenged by the requirements to successfully complete a foreign language class requirement at the college level. LD students have reported that foreign language classes move at a rapid pace and they can have difficulties in comprehending the instructor and identifying where words begin and end (Downey, Snyder, & Hill).

The University of Colorado allows students to enter this program as a way to satisfy the University's requirement for three semesters of foreign language classes. The program highlights include the faculty and students committing to complete all three

semesters in the modified program and the students take 12 credits (minimum amount to still be full time student) for each of the three semesters. Faculty selected for this program has either demonstrated skills in instruction for students with disabilities or they complete a self directed program to enhance skills in this area. Downey, Snyder, and Hill (2000) report that students in this program have demonstrated an ability to successfully meet the University curriculum for the foreign language requirement without needing to request course substitutions.

OVR may want to factor studies such as this when strictly enforcing an 8 semester funding maximum. Students taking 12 credits in a semester are meeting the full time attendance requirement and it may be considered a reasonable accommodation for the VR client to be afforded the opportunity by the OVR-PSTP to attend school for an additional semester or two beyond the normal 8 semester program maximum. In order to graduate within 8 semesters, a student would likely have to average 15 to 16 credits per semester.

CHAPTER 6

SUMMARY

With post-secondary training established as a legitimate and vital Vocational Rehabilitation service, the literature further informs VR stakeholders to issues that are relevant regarding Pennsylvania's OVR College and Other Post Secondary Policy. When approaching this topic, the possible impact and potential issues of the OVR-PSTP on VR clients that are attending or plan to attend college has been at the forefront of this research paper. There is an ample amount of literature that addresses broad and specific issues for VR clients. There is also research into approaches and programs that currently exist to assist VR clients with financial costs and to assist on campus with reasonable accommodations. It seems that a significant amount of research does exist in addressing issues pertaining to learning support services for students with LD. It could be surmised that this is because of the variety of possible supports, the interpretation of what constitutes a reasonable accommodation and the individual needs of the student involved as well as the curriculum in which they are majoring.

OVR's use of Federal Methodology to as part of the determination of funding eligibility is in line with what the vast majority of what post-secondary schools use to determine institutional aid and what other third party aid programs use (Rubin, 2011).

Although there are aid and grant programs for students with disabilities to attend post-secondary school, it is very possible that the grants and aid amounts will not be known to the student until a brief period of time remains before the student must decide on school enrollment. OVR should be aware of this possible unintended consequence of using Federal Methodology.

According to Long (2010), when considering the available research and studies on financial aid grants, how a grant policy is designed and whether the aid is need based or merit based are important factors to overall efficacy. Long (2010) states that policy design should consider accessibility of the grant and how the targeted groups of students are notified on the possibility of aid.

Pennsylvania's OVR College and Other Post Secondary Policy does seem to recognize Long's (2010) assessment that in any program that allocates a limited amount of funds, the program must find a balance between maximizing the use of funds while limiting the funds to a group that has been found to meet program eligibility criteria.

When OVR Counselors are discussing post-secondary training as an option with VR clients, discussing relevant financial aid issues pertaining to the FAFSA and how OVR specifically calculates financial aid for training would seem warranted. Especially when considering that studies have found that financial aid counselors at community colleges reported that up to two-thirds of their students were not aware of what financial aid meant (McKinney & Novak, 2013).

Based on available research, OVR should continue to assist VR clients with funding towards post-secondary education. A person with a college or advanced degree that is employed full time pays, on average, \$5,300 more in annual federal income taxes than a person employed full-time with a high school diploma as highest level of education. Studies have shown that a college education is a good return on investment. On average, a person with a bachelor's degree or higher degree can expect to earn \$440,000 more in overall lifetime earnings than a person without any college degree (The Hamilton Project, February, 2007).

Research also seems to support that OVR college funding policy should continue to consider college funding eligibility based on the client/family income (needs based) rather than on the client GPA (merit based). Merit based programs tend to influence students from higher income backgrounds while neglecting students from lower income backgrounds (Long, 2010).

The fact that OVR does not consider room and board costs for the students' first two years may be counterproductive to the OVR mission. This could be especially true when considering the needs of a VR client with a physical disability that has ambulatory or attendant care issues. Birdwell and Fonosch (1980) found students that may require attendant care throughout their lives can gain experience in scheduling, planning and incorporating attendant and personal care needs into their daily routines when they reside on campus. These experiences, when treated as routine and uneventful, can positively impact and mirror issues that VR clients might come across when entering the workforce after completing post-secondary education. Birdwell and Fonosch (1980) also reported that when students with physical disabilities reside on campus it can also help create awareness among faculty and non-disabled students to disability issues and positively impact socialization among all students and the campus community.

One final issue in the OVR-PSTP that should be given consideration by OVR Management is the fact that a VR client receiving SSI/DI may be negatively impacted in their junior and senior years by having their OVR funding greatly reduced from what the clients received as freshman and sophomores. The following scenario further illustrates this.

Scenario:

Freshman and Sophomore year at College (169 Formula C is used).

-Client on SSI/SSDI, attends Duquesne University or Penn State (for example, or another private school or state related school).

-Client resides locally and commutes to school.

-Client's EFC is zero and qualifies for maximum PELL and Pheaa grants.

-PELL and Pheaa grants are less than the total costs of tuition, fees, books, supplies and transportation.

-SSI/DI client is eligible for maximum OVR funding, \$4620 in Freshman and Sophomore years 1 and 2.

Then, in Junior and Senior years 3 and 4 at College (169 Formula D is used).

-Client on SSI/SSDI, attends Duquesne University or Penn State (for example, or another private school or state related school).

-Client resides locally and commutes to school.

-Client's EFC is zero and qualifies for maximum PELL and Pheaa grants.

-The SSHE average costs of tuition, fees, books and supplies is \$9420 and is less than costs for Duquesne University or Penn State, therefore the SSHE average costs of \$9420 are used as client's school costs.

-PELL and Pheaa award amounts are equal to or greater than the SSHE average costs.

-When PELL and Pheaa grants subtracted from SSHE average costs, the eligible OVR funding amount is 0 (zero).

-SSI/SSDI client is eligible for no OVR funding in Junior and Senior years 3 and 4 as PELL and Pheaa grants are equal to or more than the SSHE average cost commuter rate.

One possible starting point to consider in remedying this scenario could be to keep the Calculations in Formula D of the 169 as they are. But also add into the policy something along the lines that states if the result of calculations using Formula D results in the client being eligible for less than the max rates of Formula C, then OVR can use Formula C calculations to calculate SSI/DI client funding in the Junior and Senior years (years 3 and 4). So long as using Formula C does not result in an over-award. Which it would not assuming the same numbers from Formula D are entered into Formula C.

If the OVR funding is capped at SSHE max rates in Formula D, it still allows clients the options to attend an SSHE school and have all costs not covered by grants to be covered by OVR at the SSHE school in years 3 and 4 of college. But allowing for Formula C to be considered would eliminate endless waiver requests, allow vocational planning to accurately anticipate 4 years of college and maintain fiscal integrity by controlling costs that are not in excess of the average community college rates.

One final consideration to the OVR-PSTP provision of not supporting summer classes for clients attending post-secondary school may be in the area of internships and externships. Burgstahler and Bellman (2009) found that internships for students with disabilities have enabled students the chance to network, prove themselves in a work environment and to demonstrate the ability to learn new skills and apply knowledge gained in the classroom. Students with disabilities have reported that internships helped to enhance their efforts at studying and working towards increasing knowledge of specific skills in their career pursuit. Internships, externships and other learning experiences in a work environment can be of benefit to students preparing to complete college and enter the workforce (Burgstahler & Bellman, 2009).

In conclusion, the Pennsylvania OVR College and Other Post Secondary Policy does seem to offer legitimate opportunities for VR clients to attend post-secondary training. Research shows that persons with disabilities have been very successful in post-secondary education and this can in turn lead to better paying jobs, increased economic opportunities within the community and increased social growth. OVR should also continue to consider and evaluate how the Pennsylvania OVR College and Other Post Secondary Policy can negatively impact clients through unintended consequences.

REFERENCES

- Bettinger, E., P., & Long, T., B. (2005). Remediation at the community college: Student participation and outcomes. *New Directions for Community Colleges, 129*, 17-26.
Retrieved from: <http://web.ebscohost.com.proxy.lib.siu.edu>
- Birdwell, V., & Fonosch, G. G. (1980). Model attendant care program benefits all. *Journal of Rehabilitation, 46*, 26-31. Retrieved from:
<http://web.ebscohost.com.proxy.lib.siu.edu>
- Boutin, D. L., & Wilson, K. (2009). An analysis of vocational rehabilitation services for consumers with hearing impairments who received college or university training. *Rehabilitation Counseling Bulletin, 52*, 156-166. doi:10.1177/0034355208320074
- Burgstahler, S., & Bellman, S. (2009). Differences in perceived benefits of internships for subgroups of students with disabilities. *Journal of Vocational Rehabilitation, 31*, 155-165. doi: 10.3233/JVR-2009-0485
- DaDeppo, L. M. W. (2009). Integration factors related to the academic success and intent to persist of college students with learning disabilities. *Learning Disabilities Research & Practice, 24*, 122-131. Retrieved from:
<http://web.ebscohost.com.proxy.lib.siu.edu>
- Doren, B., Gau, J. M., & Lindstrom, L. E. (2012). The relationship between parent expectations and post school outcomes of adolescents with disabilities. *Exceptional Children, 79*, 7-23. Retrieved from:
<http://web.ebscohost.com.proxy.lib.siu.edu>

- Downey, D. M., Snyder, L. E., & Hill, B. (2000). College students with dyslexia: Persistent linguistic deficits and foreign language learning. *Dyslexia, 6*, 101-111. Retrieved from: <http://web.ebscohost.com.proxy.lib.siu.edu>
- Ellis, N., Johnston, V., Gargett, S., MacKenzie, A., Strong, J., Battersby, M.,... Jull, G. (2010). Does self-management for return to work increase the effectiveness of vocational rehabilitation for chronic compensated musculoskeletal disorders? – Protocol for a randomised controlled trial. *BMC Musculoskeletal Disorders*. Advance online publication. doi:10.1186/1471-2474-11-115
- Field, S., Sarver, M. D., & Shaw, S. F. (2003) Self-determination: A key to success in postsecondary education for students with learning disabilities. *Remedial and Special Education, 24*, 339-349. Retrieved from: <http://web.ebscohost.com.proxy.lib.siu.edu>
- Harpur, P., & Loudoun, R. (2011). The barrier of the written word: Analysing universities' policies to students with print disabilities. *Journal of Higher Education Policy and Management, 33*, 153-167. doi:10.1080/1360080X.2011.550088
- Harris, J., Ho, T., Markle, L., & Wessel, R. (2011). Ball state university's faculty mentorship program: Enhancing the first-year experience for students with disabilities. *About Campus, 16*, 27-29. doi: 10.1002/abc.20058
- Heiman, T., Kariv, D. (2004). Manifestations of learning disabilities in university students: Implications for coping and adjustment. *Education, 125*, 313-324. Retrieved from: <http://web.ebscohost.com.proxy.lib.siu.edu>

Interviews conducted with OVR District Administrator Marci Katona and Vocational Rehabilitation Supervisor Terry Huey from September 2011 through October 2013.

Institute for College Access & Success. (2009). *Quick facts about financial aid and community colleges, 2007-2008*. Retrieved from:

http://projectonstudentdebt.org/files/pub/cc_fact_sheet.pdf

Kosciulek, J. F. (2007). A test of the theory of informed consumer choice in vocational rehabilitation. *Journal of Rehabilitation*, 73, 41-49. Retrieved from

<http://web.ebscohost.com.proxy.lib.siu.edu>

Lombardi, A. R., & Murray, C. (2011). Measuring university faculty attitudes toward disability: Willingness to accommodate and adopt universal design principles.

Journal of Vocational Rehabilitation, 34, 43-56. doi:10.3233/JVR-2010-0533

Long, B. T. (2010). Making college affordable by improving aid policy. *Issues in Science and Technology*. 26, 27-38. Retrieved from:

<http://web.ebscohost.com.proxy.lib.siu.edu>

Madaus, J. W. (2006). Employment outcomes of university graduates with learning disabilities. *Learning Disability Quarterly*, 29, 19-31. Retrieved from:

<http://web.ebscohost.com.proxy.lib.siu.edu>

Miller, L. A., O'Mara, S., & Getzel, E. E. (2009). Saving for post-secondary education: Strategies for individuals with disabilities. *Journal of Vocational Rehabilitation*,

31, 167-174. doi:10.3233/JVR-2009-0486

- McKinney, L., & Novak, H. (2013). The relationship between FAFSA filing and persistence among first-year community college students. *Community College Review, 41*, 63-85. doi:10.1177/0091552112469251
- Murray, C., & Wren, C. T. (2003). Cognitive, academic, and attitudinal predictors of the grade point averages of college students with learning disabilities. *Journal of Learning Disabilities, 36*, 407-415. Retrieved from:
<http://web.ebscohost.com.proxy.lib.siu.edu>
- National Joint Committee on Learning Disabilities (1999). Learning disabilities: Issues in higher education. Retrieved from:
<http://www.ldonline.org/about/partners/njclld/archives>
- Ohio Opportunities for Ohioans with Disabilities. (2011). *Consumer guide to post-secondary educational training*. (Catalog# S-3). Retrieved from:
<http://ood.ohio.gov/docs/internet-documents/s-3-consumer-guide-for-internet-6-11.pdf?sfvrsn=2>
- Pennsylvania Department of Labor and Industry, Office of Vocational Rehabilitation. (2011). *2012 Combined Agency State Plan- 2012 Federal Fiscal Year Update*. Retrieved from:
<http://www.portal.state.pa.us/portal/server.pt?open=514&objID=608679&mode=2>
- Pennsylvania Department of Labor and Industry, Office of Vocational Rehabilitation. (2013). *2012 Annual report*. (Form No. OVR-624). Retrieved from
<http://www.portal.state.pa.us/portal/server.pt?open=514&objID=618579&mode=2>

- Rubin, R. (2011). The pell and the poor: A regression-discontinuity analysis of on-time college enrollment. *Research in Higher Education, 52*, 675-692.
doi:10.1007/s11162-011-9215-6
- Ryan, J. (2007). Learning disabilities in Australian universities: Hidden, ignored, and unwelcome. *Journal of Learning Disabilities, 40*, 436-442. Retrieved from:
<http://web.ebscohost.com.proxy.lib.siu.edu>
- Shaw, S. F., Madaus, J. W., & Banerjee, M. (2009). Enhance access to postsecondary education for students with disabilities. *Intervention in School and Clinic, 44*, 185-190. doi:10.1177/1053451208326047
- Snyder, T. D., & Dillow, S. A. (2012). *Digest of Education Statistics 2011* (NCES 2012-001). National Center for Education Statistics, Institute of Education Sciences, U.S. Department of Education. Washington, DC. Retrieved from:
http://nces.ed.gov/pubs2012/2012001_5.pdf
- The Hamilton Project. (2007, February). *College grants on a postcard: A proposal for simple and predictable federal student aid* (Policy Brief No. 2007-01).
Washington, DC: The Brookings Institution. Retrieved from:
<http://web.ebscohost.com.proxy.lib.siu.edu>
- Three formulations of the nexus requirement in reasonable accommodations law. (2013, March). *Harvard Law Review, 126*, 1392-1413. Retrieved from:
<http://web.ebscohost.com.proxy.lib.siu.edu>
- U.S. Department of Education. Fiscal Year 2011. Monitoring Report on the Pennsylvania Office of Vocational Rehabilitation Program. Office of Special Education and Rehabilitative Services, Rehabilitation Services Administration. August 8, 2011

U.S. Department of Labor, Bureau of Labor Statistics. (2013). *The employment situation*

January-2013 (USDL-13-0144). Retrieved from:

<http://www.bls.gov/news.release/pdf/empisit.pdf>

West Virginia Department of Education and the Arts, Division of Rehabilitation Services.

(2009). *Rehabilitation training manual*. Retrieved from:

<http://www.wvdrs.org/policy/CSM/3600%20REHABILITATION%20TRAINING.PDF>

Wilson, M. G., Hoffman, A. V., & McLaughlin, M. J. (2009). Preparing youth with disabilities for college: How research can inform transition policy. *Focus On*

Exceptional Children, 41, 1-10. Retrieved from:

<http://web.ebscohost.com.proxy.lib.siu.edu>

Wolf-Branigin, M., Daeschlein, M., Cardinal, B., & Twiss, M. (2000). Differing priorities of counselors and customers to a consumer choice model in

rehabilitation. *Journal of Rehabilitation*, (January/February/March), 18-22.

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