

# Chapter 20

## USOR Training Programs & Facilities

### Table of Contents

20.1 Authority	1
20.2 Policy	1
20.3 Definitions	1
20.4 Training Programs Supported by USOR	3
20.5 USOR Approved Costs for Utah System of Higher Education (USHE) Institutions	4
20.6 USOR Approved Costs for Private Training	5
20.7 ETPL Approved Programs	6
20.8 USHE Hosted Non Degree Programs	6
20.9 Support for Private In State Training Providers Without DWS ETPL Approval	7
20.10 In State Online Training	8
20.11 Out of State Training	8
20.12 Approval for Tools and Supplies	9
20.13 Approval for Community Rehabilitation Programs (CRP)	10
Appendix A Professional Training Program Resources	11

## 20.1 Authority

34 CFR 361.5(b)(9) and 34 CFR 361.51

USOR ensures that any facilities used in connection with the delivery of VR services meet program accessibility requirements consistent with the requirements of the Architectural Barriers Act of 1968, the Americans with Disabilities Act of 1990 and subsequent Amendment 2008, section 504 of the Rehabilitation Act, and the regulations implementing these laws.

## 20.2 Policy

The Utah State Office of Rehabilitation (USOR) seeks to assist eligible individuals in obtaining employment and to increase independence. Services are provided according to individual needs and informed choice. Training for employment is a component of service provision. A variety of training options are available to clients including individualized employment based training offered through Community Rehabilitation Programs (CRP) and credential training programs. Credential training programs are at the post secondary level offering degrees and certificates through private training providers, online programs, and the Utah System of Higher Education (USHE).

USOR uses programs that meet high standards of accreditation and demonstrate successful outcomes to increase the likelihood of client completion and employment attainment. For approved facilities refer to the Department of Workforce Services (DWS) Eligible Training Provider List (ETPL) on the DWS website. Community Rehabilitation Program (CRP) providers are listed on the DWS website for vendors and community rehabilitation partners. The CRP list is also available to staff in the case management system.

## 20.3 Definitions

- a. **Bootcamp** means an intensive certificate training program offered by a private, third party trainer often provided on a USHE campus through a sub contract. Bootcamp programs do not award transferable degree credits but do award certificates.
- b. **Certificate Rate** means the calculation for VR support of NON USHE certificate training programs.
- c. **Credential Training Programs** are systems for learning that award a certificate or degree that implies minimum standards for learning in a particular area have been met.

- d. **Community Rehabilitation Program (CRP)** means a vendor that provides direct services such as Supported Job Based Training (SJB T), customized employment, supported employment and extended services, and life skills training to enable individuals to maximize employment opportunities and career advancement.
- e. **Council for Higher Education Accreditation (CHEA)** is the organization that serves higher education and the public to ensure academic quality through accreditation. The council carries out periodic review of institutional and programmatic accrediting organizations offering associate, Bachelor's and advanced degrees.
- f. **Degree/ Certificate Program Cost** means the cost of attending a USHE Degree or Certificate program.
- g. **Degree Rate** means the calculation of VR supportable cost per semester hour for a non USHE degree institution. When comparing degree costs for a non USHE program, the allowable VR support will be based on the equivalent of the University of Utah program cost.
- h. **Eligible Training Provider List (ETPL)** is the DWS approved training provider list including public and private institutions awarding degrees and certificates. The Department of Workforce Services reviews programs and determines whether programs meet eligibility criteria for inclusion in the list of providers. (See Section 20.12)
- i. **Individualized Employment Based Training Programs** are programs which conduct activities designed to address life skills and workplace specific skills. The training is primarily conducted by Community Rehabilitation Programs (CRP).
- j. **Private in State Institutions** means programs that are supported primarily by the organization's own endowment funds and student tuition and fees. These are often for-profit institutions.
- k. **Professional Education (PROED) / Continuing Education** means training for individuals currently practicing in a profession to receive updated skill development and to maintain professional skills. Training is provided by professional organizations, higher education institutions, or private training providers. PROED courses are not degree programs and do not provide transferable degree credit but often result in a certificate.
- l. **Public in State Institutions** means the 16 public institutions in the state of Utah which make up the Utah System of Higher Education (USHE) including 8 technical colleges, two community colleges, four regional universities and two research universities. These institutions receive funding from Utah taxpayer funds and must meet accreditation standards.

## 20.4 Training Programs Supported by USOR

USOR supports clients in training programs that have met requirements through the Utah System of Higher Education (USHE), programs on the Department of Workforce Services Eligible Training Provider List (ETPL), private programs that have met accreditation standards, and approved Community Rehabilitation Providers (CRP).

Any training provided with USOR funds must be appropriate for the client's specific vocational goal and necessary for the client to obtain employment in the job field. Training supported by USOR must be likely to result in completion of the training with a positive outcome. Enrolling in accredited programs increases the likelihood for client program completion and employment attainment. In addition, the costs for tuition, fees, supplies, and tools for credential training programs must be consistent with state training programs to ensure fairness in pricing between vendors. USOR has established policies to govern the rates of payment for purchased rehabilitation services and a fee schedule to ensure a reasonable cost for services [34 CFR 361.50 (2)].

Training programs are designed in one of two formats:

### **a. Credential Training Programs**

The Utah System of Higher Education (USHE) is governed by the Utah Board of Higher Education. The Utah legislature grants the board power to control, manage, and supervise USHE. The major responsibilities of USHE include selection and evaluation of policy, reviewing programs and degrees. Individuals who enroll in training through USHE programs receive a credential upon completion of the program and have met a standard for entering the workforce with minimum qualifications.

Private training programs receive accreditation from the Council for Higher Education Accreditation (CHEA) and are supported through endowment funds and student tuition and fees. Individuals who enroll in training through private training programs receive a credential upon completion of the program and have met a standard for entering the workforce with minimum qualifications.

### **b. Individualized Employment Based Training Programs**

Individualized employment based training is conducted by Community Rehabilitation Programs (CRPs) to provide a variety of approved individual training activities designed to address life skills and workplace specific skills. These skills are taught by Supported Employment or Supported Job Based training employment specialists. Upon completion of these programs a client is able to work in a particular job and job category. A credential, however, is not received. For additional information see Client Service Manual Chapter 22.

Training providers fall into one of **five** categories:

- Public in state USHE institutions
- Private in state institutions that have met criteria for the Department of Workforce Services (DWS) Eligible Training Provider List (ETPL)
- Private in state non ETPL programs
- Out of state institutions
- Community Rehabilitation Providers (CRPs)

**Note:** A Client Service Recommendation is required with the appropriate approval level for private non ETPL programs. All out of state training requires Field Service Director level approval.

## 20.5 USOR Approved Costs for Utah System of Higher Education (USHE) Institutions

The Utah System of Higher Education (USHE) programs are preferred training options for USOR clients. The USHE programs should be used whenever possible to 1) meet client needs, 2) ensure that taxpayer dollars are spent on programs that have been proven to be effective, and 3) meet service standards for necessary and reasonable services. There are times when USHE programs will not meet the individual needs of a client and the counselor must determine the extent to which any training program is appropriate for USOR support.

The Utah System of Higher Education (USHE) institutions offering standard credit programs including associate and bachelor's degrees are approved at the counselor level with a Client Service Justification (CSJ)\*. These include:

- a. **College and University programs**
  - i. University of Utah, Salt Lake City
  - ii. Utah State University, Logan (main campus) and regional campuses
  - iii. Southern Utah University, Cedar City
  - iv. Utah Valley University, Orem (main campus) and satellite locations in Utah Valley and in Heber
  - v. Weber State University, Ogden (main campus) and additional locations in Roy, Davis County, and Morgan County
  - vi. Dixie State University, St. George and Hurricane Education Center in Hurricane
  - vii. Snow College, Ephraim and Richfield
  - viii. Salt Lake Community College including additional locations in Salt Lake County
- b. **Technical Colleges**
  - i. Bridgerland Technical College, Logan
  - ii. Davis Technical College, Kaysville
  - iii. Dixie Technical College, St. George
  - iv. Mountainland Technical College, Orem
  - v. Ogden–Weber Technical College, Ogden

- vi. Tooele Technical College, Tooele
- vii. Southwest Technical College, Cedar City
- viii. Uintah Basin Technical College, Roosevelt

\*Note: This does not apply to non credit certificate programs housed within state colleges but provided through a third party. Some programs such as Bootcamp/PROED/Continuing Education are provided through 3rd party contracts at non standard tuition rates and/or without degree seeking transferable credits. These programs are evaluated under the ETPL/Certificate Rate sections of this policy. See section 20.8 *USHE Hosted Non Degree Programs*.

### **VR Support for USHE training programs**

Counselors may include in the Individualized Plan for Employment (IPE) support up to full cost for certificate, associate, and bachelor's degree programs offered by all USHE programs. The IPE should also include the comparable benefits available to the client while participating in the training program. Support is based upon the credit hour tuition and fee schedule for USHE degree programs which include technical colleges. Counselors should follow the Degree Cost and Certificate Cost for the USHE program. Counselors should consult the published tuition, hourly instruction fee, and additional fees published by the USHE program for the current academic year.

## **20.6 USOR Approved Costs for Private Training**

Counselors will determine the appropriate training program according to the client's needs and informed choice. When the training is from an in state private provider, online program or out of state program the counselor must determine the appropriate level of financial support from USOR by calculating the appropriate public equivalent tuition. Comparable benefits including Federal Student Aid (FAFSA), scholarships, and other financial support should also be applied to the overall cost of the training program. USOR will support training up to or at the degree rate and certificate rate when compared to USHE programs as described below.

USOR financial support for private programs is determined according to the following:

a. **Degree Rate**

The VR supportable cost for degree programs is the equivalent of the credit hour tuition/fees rate for the current academic year of a similar University of Utah degree program.

b. **Certificate Rate**

The VR supportable cost for certificate programs is based on the hourly tuition/fees of a similar USHE/ Utah Technical College (UTC) program. If there is a similar UTC training program within 60 miles of the client's residence, the allowable Certificate Rate is up to the UTC hourly tuition/fees multiplied by three. If no similar UTC training program exists

within 60 miles of the client's residence, the VR supported Certificate Rate is up to the UTC training hourly tuition/fees multiplied by five.

## 20.7 ETPL Approved Programs

The Eligible Training Provider List (ETPL) is managed by the Workforce Development Division of the Department of Workforce Services. As a division of the Department of Workforce Services, USOR staff have access to the Eligible Training Provider List (ETPL).

This provider list includes post secondary institutions, private training providers, online programs, adult education and literacy activities for English Language Learners (ELL), apprenticeship training programs and the degree, certificate or credential offered.

There are specific standards to be listed in the ETPL including requirements for licensing, accreditation, and compliance with the Utah Division of Consumer Protection. For additional information regarding the ETPL, refer to the Workforce Development Division Policy Manual sections 8710 *Initial Eligibility: Training Provider Requirements Effective (2/21/16; 11/14/2019)*. Providers must also meet continued eligibility requirements for at least one program annually. See policy 8720 *Continued Eligibility: Training Providers (Workforce Development Division Policy Manual (5/1/2020))*.

USOR has reviewed and determined the DWS maintained ETPL to meet established and set standards for facilities supported by VR. [34 CFR 361.51]. As such the ETPL is a resource for determining USOR support of training programs.

After determining the appropriate USOR level of financial support, the counselor should consult the ETPL to determine whether the program is approved for enrollment. Programs listed on the ETPL are approved at the counselor level. If the program is included on the ETPL, the counselor proceeds with the established procedure for creating a Client Service Justification (CSJ), updating the Individualized Plan for Employment (IPE), educational goal, credential attainment, comparable benefits, Financial Needs Assessment, and generating authorization for payment.

**Note:** ETPL listed costs are NOT relevant for the purposes of USOR. Counselors calculate USOR support using the Degree or Certificate Rate calculation for USOR supportable costs.

## 20.8 USHE Hosted Non Degree Programs

Many state college programs under USHE host non degree third party certificate training such as continuing education, Bootcamps and Professional Education (PROED) training. These are not reviewed by the Council for Higher Education Accreditation (CHEA).

These programs:

- Use hourly rather than semester "credits"

- Are often pass/fail or attendance based
- Do not usually have transferable credits
- Award certificates rather than a state institution degree
- Are priced significantly higher than traditional college semester hours
- Are designed to provide a quick, targeted skill to someone who already has base skills in an industry or area

These programs are not intended to circumvent completion of standard degree and certificate training. These trainings are appropriate in circumstances where clients already have well established skills/education and require supplemental training for current practices.

Factors when considering approval may include:

- Client's prior training and relevant work experience in the vocational area
- Competitiveness in career field versus applicants with full degree level training
- Client's ability to fund remainder of costs beyond what USOR can support at certificate program cost
- Recognition/value level of any resulting certification in current employment market
- Any prior successful employment placements resulting from the same training program

The counselor must determine the appropriate level of financial support from USOR by calculating the appropriate public equivalent tuition using the Certificate Rate (see 20.6 for approved costs and calculations).

After determining the VR level of financial support, the counselor should consult the ETPL to determine whether the program is approved for enrollment (see 20.7). If the program is listed on ETPL the counselor may proceed with support at the Certificate Rate. If the program is NOT listed on the ETPL, refer to 20.9.

## 20.9 Support for Private In State Training Providers Without DWS ETPL Approval

In state training programs not listed on the Eligible Training Provider List (ETPL) may be approved for client participation, however, USOR will only pay the equivalent state program Degree rate or Certificate Rate for total cost of participation in the training program (see 20.6).

The counselor should prepare a Client Service Recommendation (CSR) that includes a review of the training program, credential attainment, and total cost of participation in the program. The CSR will be considered by the supervisor based upon approval level below as determined by total program cost which includes tuition/fees, books and supplies necessary for the training program.

### a. **Supervisor Approval Level**

In state programs not listed as approved on the ETPL website may be approved by CSR at the Supervisor level if the total program cost is less than \$5,000.

**b. Director Approval Level**

In state programs not listed as approved on the ETPL website may be approved by CSR at the Director level if the total program cost is \$5,000-\$8,000.

**c. Field Service Director Approval Level**

In state programs not listed as approved on the ETPL website which exceed \$8,000 may only be approved at the Field Service Director level.

**Note:** CSRs for private training will require additional review when there is a significant change in the program requirements, cost of the program, additional time to complete the program, etc. Counselors are required to monitor client progression in the training program at the completion of each semester.

## 20.10 In State Online Training

Online training programs must meet the same requirements for approval as other training programs. Online training may be appropriate when a client can learn most effectively from an online modality. To be considered as in state training, the online training program must originate from and be delivered within the state of Utah. Online programs that are billed from an out of state address are considered out of state. Similarly, the training program cannot have out of state travel as a requirement for completion.

The counselor must determine the appropriate level of financial support from USOR (see 20.6). After determining the level of financial support, the counselor should consult the ETPL and proceed accordingly. For programs listed on the ETPL see 20.7. For programs not listed on the ETPL see 20.9.

## 20.11 Out of State Training

A program is considered out of state if the client is required to travel out of state to participate at any level and/or if the tuition/fees require authorization to an out of state address. Out of state training *should only be considered when in state training is not feasible or when the specific training is only available from the out of state provider.* Counselors must determine if the program (including online programs) meets training accreditation standards from the Council for Higher Education Accreditation (CHEA) (see Appendix A). Counselors must then determine the USOR approved cost for the training program (see 20.6). USOR will only pay the Degree Rate or Certificate Rate for participation in the training program. If a client chooses to attend an out of state program for which there is a state equivalent, USOR is not responsible for travel,

housing, or daily living expenses that may occur as an added cost of the choice to attend an out of state program.

The counselor must prepare a Client Service Recommendation (CSR) request prior to assisting the client in the training program. All out of state training programs including services related to participating in the training program require Field Service Director (FSD) approval.

**Note:** CSRs for out of state training will require additional review when there is a significant change in the program requirements, cost of the program, additional time to complete the program, etc. Counselors are required to monitor client progression in the training program at the completion of each semester.

## 20.12 Approval for Tools and Supplies

Supplies (including books) may be required for a client to participate in a training program supported by USOR. Comparable benefits and client contributions should be applied before VR support of the overall cost of the training program which includes supplies and/or tools. The VR counselor must consider the necessary, appropriate, and reasonable costs when determining VR support.

Tools purchased by VR are subject to state purchasing policy and approval levels (CSM 12, Appendix 12A) and require a signed equipment receipt. When determining VR support for the purchase of tools and supplies for a training program, the counselor must document the method and information used to determine the appropriateness of the purchase. The counselor should work closely with the training program advisors and instructors and review industry standards to ensure any purchased tools and supplies are necessary for participation in the training program.

Counselors should consider the following in the purchase of supplies and tools:

- A **necessary** good is one that is essential for the client to receive in order to overcome an impediment(s) to employment.
- An **appropriate** good or service is one that is of suitable and of sufficient quality to fully meet the client's needs and circumstances.
- A **reasonable** cost is one that does not exceed that which would be incurred by another person under the circumstances and is the market price for comparable goods and services of the geographic area (2 CFR 200.404).

### USHE Programs

- USOR will pay for the required tools/supplies published by the program.

### Non USHE Training

- USOR will pay the reasonable costs of tools/supplies recommended by the program provider in order to complete the training.

## 20.13 Approval for Community Rehabilitation Programs (CRP)

Services to assist clients in preparing for employment may be provided by USOR staff or through approved vendors including Community Rehabilitation Providers (CRPs). Services provided by CRPs include vocational assessment, vocational training, and extended employment supports.

USOR has a responsibility to ensure that contracted services are provided by qualified vendors. CRPs providing employment services have received training, certification and are expected to adhere to USOR terms of service including the USOR fee schedule. CRPs also agree to follow ethical standards of the rehabilitation profession. USOR has established an approval process for rehabilitation facilities who wish to provide services as an approved vendor.

The vendor completes the “*Community Rehabilitation Program Application*” which requires the facility name, address, phone number, email address, and the facility site contact. The application process also requires the type of facility including profit, non-profit, the business license, governing board members, and the type of services provided (Assessment, Supported Job Based Training, Supported Employment, and Customized Employment). The application includes documents for signed endorsement of the CRP to comply with Federal Law and Regulations concerning accessibility, civil rights, Americans with Disabilities Act, Rehabilitation Act sections 501,503, and 504, and the Architectural Barriers Act. The application process also requires the CRP to submit three professional references.

The application is submitted to the Employment Support Services Coordinator (ESSC) and reviewed according to approval guidelines. The ESSC conducts an interview with the prospective provider. The pending application is sent to the Supported Employment Coordinator for additional review. Upon recommendation, the pending application is submitted for final approval to the Assistant Director of Rehabilitation Services. The facility is approved when found to have complied with all standards and agreements have been met. Periodic reviews will be conducted for continuing approval, disapproval, or other appropriate action as recommended. Approved providers will be added to the approved provider list accessible in the case management system and on the USOR website.

## Appendix A Professional Training Program Resources

### Approved Training Programs within the State of Utah

- Utah Higher Education Assistance Authority <https://uheaa.org/>
- Utah System of Technical Colleges: <http://www.utech.edu/>
- ETPL: <https://jobs.utah.gov/jsp/utjobs/seeker/provider-compare>
- Vendors and Community Rehabilitation Providers  
<https://jobs.utah.gov/usor/vr/partners/crp.html>

### Council for Higher Education Accreditation (CHEA) Approved Organizations

- Accrediting Commission for Community and Junior Colleges (ACCJC) Western Association of Schools and Colleges
- Higher Learning Commission (HLC)
- Middle States Commission on Higher Education (MSCHE)
- New England Commission of Higher Education (NECHE)
- Northwest Commission on Colleges and Universities (NWCCU)
- Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)
- WASC Senior College and University Commission (WSCUC)