

## **208.00P Comparable Benefits and Services**

December 1997 (Rev. January 2004)

See corresponding policy: 208.00 Comparable Benefits and Services Policy

Note: Vocational Rehabilitation procedures provide internal guidance for ACCES-VR staff only and create no procedural or substantive rights for any individual or group.

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### **Description**

The required pursuit of comparable benefits is limited to benefits available from federal, State and local grant sources, health insurance and employee benefit programs that are applicable to services required for the successful completion of the IPE.

### **Sources of Comparable Benefits**

Comparable benefits are to be pursued only for goods and services that are provided or paid for by:

1. Federal, State or local public agencies. Examples would include Medicaid, Veteran's Benefits, TAP, Pell, reduced fare public transportation for individuals with disabilities, publicly funded para-transit services, etc.
2. Health insurance, from any source.
3. Employers. Examples would include tuition assistance, transportation, training courses, health insurance benefits, etc.
4. Comparable benefits do not include awards and scholarships based on merit.

### **Services Excluded from Comparable Benefits**

Services specifically excluded from the required consideration of comparable benefits are those that relate to:

1. assessment for purpose of determining eligibility or for determining vocational rehabilitation needs;
2. vocational counseling, guidance and referral services;
3. training services, except for primary and support services, which are part of a post-secondary program, including college, community college, trade school, business school, nursing school, etc.;
4. placement services; and,

5. rehabilitation technology.

### **Comparable Benefits**

1. Private Scholarships or contributions from non-governmental sources:  
While scholarships or other similar contributions are not comparable benefits under federal regulations, it is still appropriate to ask a consumer if they are in receipt of such benefits.
2. Consumers must be advised of their responsibility to make maximum effort toward securing comparable benefits as soon in the IPE development process as possible to insure that comparable benefits will be available at the time services are initiated.
  - A. Where there will be a delay in the receipt of comparable benefits that would prevent a consumer from starting a program as soon as it would be offered, consideration of comparable benefits may be waived if the following conditions apply:
    - i. The consumer has made conscientious and timely effort in applying for comparable benefits; and
    - ii. The program or support services for the program which are dependent upon comparable benefits would result in a delay of six months or more in starting the program.
    - iii. Example: A consumer has made application for comparable benefits as soon as he/she was aware that they would be needed as part of the vocational rehabilitation program. Consumer has been conscientious in following up on receiving these benefits. It is now December 31 and it has become known that it will take until August 1 before the benefits would become available. The training program that is part of the agreed upon IPE will begin on July 1. The next session will not begin until the following February 1. Since the consumer has made good faith efforts and would otherwise need to wait more than six months, the training program should proceed on July 1 without waiting for receipt of comparable benefits.
  - B. If the total cost of service is less than \$500.00 and the consumer has made conscientious and timely effort in applying for comparable benefits, consideration of comparable benefits may be waived without the six month delay requirement noted above in 1b.
  - C. Exceptions may be made with approval of the District Manager or his/her designee where circumstances related to cost effectiveness or where there is clear and convincing evidence that delay would cause undue hardship to a consumer.

### **Student Loan Default**

ACCES-VR cannot pay for training or related services at post-secondary programs eligible for TAP and PELL for individuals in default of a student loan until that individual has re-established eligibility for financial aid.

## Case Recording

1. In all cases, document in the case record the comparable benefits that are available to the consumer, including the date of the consumer's application for benefits, the receipt or denial of benefits, and the amounts of any benefits to be received by the consumer. This information can be documented in any of the following: the Comparable Benefits Checklist, College Financial Aid statement, the VES-845 ACCES-VR Contribution Calculation Worksheet or in a case note, using the Comparable Benefits header or confirmation from the source of the comparable benefit.
2. The IPE must document the amount of the comparable benefit, as it applies to each line of service. If there is no comparable benefit available to reduce the cost of the service, then the amount to enter in the comparable benefit field on the CAMS IPE service screen is 0. If there is a known comparable benefit, the amount of that known benefit must be entered in the comparable benefit field. If there is a possible comparable benefit, or a known comparable benefit but the specific dollar value of that is unknown at the time the IPE is being prepared, the comparable benefit field can be left blank. This will print out on the IPE as Comparable benefit unknown.
3. When ACCES-VR has provided services without obtaining comparable benefits because of:
  - A. Medical risk:

The record of services must identify the specific medical condition and how it poses a risk to the consumer. This must be based on documented medical information.
  - B. Loss of job placement:

The record of services must identify the job and employer and briefly justify how a delay in pursuing comparable benefits would have resulted in loss of job placement.
  - C. Benefits not available to implement the IPE  
The record of services must identify the name of the comparable benefit and the reason it is not available and describe why delay in provision of services at this time will prevent future implementation of the objectives of the IPE.