# Financial Participation in Vocational Rehabilitation (VR) Services at MRC

## Overview of Financial Participation in VR:

Vocational Rehabilitation (VR) services are **highly individualized** and based on the employment goal written in the consumer’s Individualized Plan for Employment (IPE). The consumer’s goal is developed according to their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice. For this reason, each person’s VR services will look different.

## Do I have to pay for my VR services?

Some VR services are provided without assessing a consumer’s financial eligibility, while others require a **financial needs test**. VR services that are provided without consideration of financial eligibility include:

* assessment for determining eligibility for VR,
* assessment for determining VR needs,
* VR counseling and guidance,
* information and referral,
* job-related services,
* personal assistance services,
* auxiliary aids or services (e.g., interpreter, reader, etc.).

## Examples of VR services subject to a financial needs test may include:

* tuition and fees for higher education and/or an employment training program
* occupational licenses
* maintenance and transportation
* occupational tools and supplies
* medical restoration
* other services necessary to meet the employment goal

## What is a financial needs test?

The financial needs test is a brief document that asks for information about a consumer’s taxable income and assets. If an individual is claimed as a dependent or has a spouse, the income of others in the household may also be considered. The financial needs test is typically completed at the beginning of each fiscal year, or before the VR agency agrees to provide a paid service.

According to the federal VR regulations, a VR agency may conduct a financial needs test to determine whether a consumer is responsible for contributing to the cost of their VR services. The VR agency must maintain written financial policies that specify which services require a financial needs test, and which services are exempt from cost participation/financial needs test. These policies must be applied uniformly to all individuals.

The financial needs test must ensure that a consumer’s participation in the cost of VR services is:

* Reasonable
* Based on the consumer’s financial need and takes into account disability related expenses that have been paid for by the consumer
* Not so high as to effectively deny a service

## Do I have to take a financial needs test if I have low income?

Consumers who receive benefits from the Social Security Administration (SSA) such as Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) are not required to take a financial needs test. These consumers are not required to contribute to the cost of their VR services. If the VR Agency does not agree to fully fund a service or program in support of an employment goal, the consumer is not expected to incur the expense (e.g. taking out a loan). Alternatively, the consumer can appeal the decision.

## What are comparable benefits?

Before the VR agency agrees to pay for a service consistent with the IPE, the consumer must find out whether the service can be paid for or provided through health insurance or another government program. These resources are known as comparable benefits. The VR agency can also assist consumers in finding other sources of funding that they would not have to pay back, if the search would not delay the VR services.

## VR services that are not subject to comparable benefits are:

* assessments for determining eligibility and VR needs
* rehabilitation counseling and guidance
* job-related services (such as job searching, job placement services, and assistance with job retention)
* rehabilitation technology in the form of devices and aids
* referral to other workforce development providers
* post-employment services

## Can VR put a cap on the money they spend toward my services?

A VR agency is allowed to establish a fee schedule designed to ensure reasonable costs to the program for VR services. The policies must ensure that the fee schedule is not so low that it will effectively deny a consumer a service that they need. They should allow for exceptions so that individual needs may be met. Finally, there cannot be absolute dollar limits on specific categories on the total services provided to a consumer.

## What is maximum obligation?

MRC has written policies about the rates of payment for all purchased VR services. Maximum obligation is a defined dollar amount allotted to spend toward a consumer’s services. While MRC is permitted to establish their maximum obligation, VR agencies may not place absolute dollar limits on specific service categories or on the total services provided to a consumer. Thus, if the VR agency has a maximum obligation for consumers, they must provide for a waiver process that allows a consumer to access needed funding. If a consumer disagrees with VR’s decision about funding, they may appeal.

When selecting services, the VR agency may have a preference for in-state providers. However, they cannot effectively deny a service needed to meet the consumer’s employment goal. If a consumer chooses an out-of-state provider, VR could pay the in-state rate. The VR policy cannot effectively deny out-of-state service

For example, VR consumers in Massachusetts generally cannot receive funding to attend college/graduate school out-of-state. However, if the individual has specific reasons requiring them to attend a school outside of Massachusetts, the VR agency can choose to pay the equivalent amount they would have paid toward in-state tuition by using a waiver.

If a consumer requests funding for a service that exceeds the VR agency’s maximum obligation policy, the consumer can appeal VR’s decision, especially if they receive benefits from the Social Security Administration (SSA). The Client Assistance Program (CAP) is a resource available for consumers to utilize to get help and potentially representation in these appeals.