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January 15, 2017

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Dear Sir or Madam,

Enclosed please find (2) two hard copies of a report required by Minnesota 2016 Session Law, Chapter 189, Article 1, Sec. 29., concerning academic plans for students with intellectual and developmental disabilities offered by Minnesota State. Copies of this report, "Program for Students with Intellectual and Developmental Disabilities," were delivered to Representative Bud Nornes, Chair of the House Education Policy and Finance Committee; Representative Gene Pelowski, Minority Lead of the House Education Policy and Finance Committee; Senator Michelle Fischbach, Chair of the Higher Education and Workforce Development Committee; Senator Greg Clause, Minority Leader of Higher Education and Workforce Development Committee.

Please contact me, <a href="mailto:brent.glass@so.mnscu.edu">brent.glass@so.mnscu.edu</a> if you have any questions or concerns.

Sincerely,

But blom

**Brent Glass** 

Interim Associate Vice Chancellor for Student Affairs

c: Ron Anderson, Vice Chancellor for Academic and Student Affairs Jaime Simonsen, Director of Legislative Communications



January 15, 2017

**Academic and Student Affairs** 

# Program for Students with Intellectual and Developmental Disabilities: Report to the Legislature

**Minnesota State** 

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### **Executive Summary**

Minnesota State is committed to serving a diverse student population, including nearly 10,000 students who have self-identified as having physical, learning, or intellectual disabilities through our disability access offices located at each colleges and university. Students with disabilities are a vibrant part of campus life and we are committed to ensuring that all of our students are given opportunities to succeed.

In 2016, Minnesota State was charged with the task of developing a plan for inclusive programming specifically for those individuals with intellectual and developmental disabilities (2016, Chapter 189, Article 1, Section 29). A team of faculty, staff, and community members with interest and expertise in serving students with intellectual and developmental disabilities was convened. Team members represented a variety of functional areas including accessibility/disability services, faculty in occupational skills programs, career services, and student services.

In addition to researching the program at Bethel University which launched their first student cohort in 2015, team members also reviewed programs in other states and the Occupational Skills program at Ridgewater College (32 credit diploma or 28 credit certificate program) and Central Lakes College (34 credit diploma program).

Consistent with legislation, team members outlined program elements to be considered if a program was to be implemented. These components include:

- curriculum,
- leadership development and community engagement,
- peer mentoring,
- residential experience,
- partnerships and program support structures, and
- admissions.

The team also considered the program development costs and financial sustainability of implementing a program. There are considerable start-up costs which includes the hiring of additional staff to design and support these programs.

- The net cost of providing a program at one Minnesota State university is estimated at \$193,025 for first year start-up costs in FY2018, \$275,654 for one cohort of 10 students in FY2019, and \$266,256 for two cohorts of 10 students each in FY2020.
- The net cost of providing a program at one Minnesota State college is estimated \$196,745 for first year start-up costs in FY2018, \$291,044 for one cohort of 10 students in FY2019, and \$357,452 for two cohorts of 10 students each in FY2020.



- If four programs were established, two at colleges and two at universities, the net cost of offering the four programs would be: \$779,540 for first year start-up costs (FY2018), \$1,133,396 for the first cohort of students (40 students in FY2019), and \$1,247,416 for two cohorts of students (80 students in FY2020).
- When the four programs are fully operational and serving 80 students, the estimated per student general fund cost is \$15,593 per student. This compares to \$5,129 in average per student state funding provided to Minnesota State students throughout our system.

Implementation of the program described requires full funding from the legislature for the costs outlined in this report and for additional expenses that may be incurred in making reasonable accommodations for students admitted to the program. Given the current fiscal and staffing resources at all Minnesota State institutions, program implementation could not proceed without a legislative commitment to fund current and future costs associated with the program.

The need for additional resources is a central challenge to the implementation of this plan. Serving the diverse individual needs of learners and preparing students to achieve career goals is central to the mission of Minnesota State. Certain components of this plan fit the mission of Minnesota State; however, the resources needed to successfully implement all components outlined in the plan would require a shift in focus to direct resources to this student population potentially to the detriment of existing programs and services designed to increase student success and gainful employment after graduation.

In an analysis of programs across the nation using ThinkCollege.net and other resources, the team examined both two and four-year institutions, public and private, with and without traditional housing options on campus. The results showed that of those institutions that provide programing specifically for students with intellectual and/or developmental disabilities most were located at two-year institutions and did not include an on-campus residential component. For those institutions that do offer housing they offer both on and off-campus options. In addition the following challenges were identified by the team that the plan must overcome for the program to be implemented including:

- Minnesota State has a limited number of campuses that have a residential component which limits the number of potential sites where a program such as this could be implemented.
- The potential pool of students that has been identified are also classified as vulnerable adults which adds additional liability issues. The institutions, individuals and parents/guardians will need to strongly consider what level of risk they are comfortable with before entering such a program.
- It has not been determined if reasonable accommodations would be sufficient without fundamentally altering the nature of the course area to support students with intellectual and/or developmental disabilities. In addition, enrollment in rigorous



- coursework in the student's chosen field of study will depend upon placement exam scores.
- Institutions hosting this program may not have existing faculty and/or staff with necessary training and skill to provide appropriate services to students with intellectual and/or developmental disabilities.
- The level of student demand is unknown at this time.
- More analysis is required from housing professionals to determine potential facility, staffing, and programmatic modifications to maximize the benefit of the residential component for program participants.



### Charge

2016 Session Chapter 189, Article 1, Section 29

Sec. 29.

MNSCU PROGRAM FOR STUDENTS WITH INTELLECTUAL AND DEVELOPMENTAL DISABILITIES; PLAN REQUIRED.

Subdivision 1.

Development of plan required.

The Board of Trustees of the Minnesota State Colleges and Universities must develop a plan for offering an academic program for students with intellectual and developmental disabilities, consistent with the principles established in subdivisions 2 to 4.

#### Subd. 2.

Program locations.

The plan developed must assume the program will be offered at up to four college or university campuses chosen based on (1) their ability to offer a robust program using existing facilities and resources and (2) a goal to provide the program in diverse geographic regions of the state.

#### Subd. 3.

Enrollment and admission.

The plan developed must assume an enrollment goal for each campus's program of at least ten incoming students per academic year. The plan may allow for students to be admitted based on an application process that includes an in-person interview; an independent assessment of an applicant's interest, motivation, and likelihood of success in the program; and any other eligibility requirements established by the board. Upon successful completion, a student must be awarded a certificate, diploma, or other appropriate academic credential.

### Subd. 4.

Curriculum and activities.

(a) The plan developed must assume a program that provides an inclusive, two-year full-time residential college experience for students with intellectual and developmental disabilities. The required curriculum must include core courses that develop life skills, financial literacy, and the ability to live independently; rigorous academic work in a student's chosen field of study; and an internship, apprenticeship, or other skills-based experience to prepare for meaningful employment upon completion of the program.



- (b) In addition to academic requirements, the plan developed must allow participating students the opportunity to engage fully in campus life. Program activities must include but are not limited to (1) the establishment of on-campus mentoring and peer support communities and (2) opportunities for personal growth through leadership development and other community engagement activities.
- (c) A participating campus may tailor its program curriculum and activities to highlight academic programs, student and community life experiences, and employment opportunities unique to that campus or the region of the state where the campus is located.

Subd. 5. Report to legislature.

The board must submit a report on the plan required to be developed by this section to the chairs and ranking minority members of the committees of the legislature with jurisdiction over higher education finance and policy and human services finance and policy no later than January 15, 2017. The report must describe program plans, including strategies for recruitment of applicants, and strategies to address anticipated program needs that cannot be filled using existing campus or system resources.

### **Effective Date**

This section is effective the day following final enactment.



### Introduction

Parents, guardians, and individuals with intellectual and developmental disabilities have been looking for additional educational opportunities beyond high school for quite some time. There are numerous transition programs that teach independent living and employment skills, but very few that utilize college and/or university campuses. Minnesota has two occupational skills programs (OSP) operating on community college campuses (Ridgewater College and Central Lakes College). Both the Ridgewater College and Central Lakes College OSPs work under the guidelines for a comprehensive transition program as defined by the Federal Student Aid handbook, volume 2. The state also has a private college, Bethel University, which launched their BUILD program in 2015. In addition to the existing programs Minnesota has also committed to increasing the number of individuals with disabilities working in competitive employment and/or pursuing an education at the college or university level through its Olmstead Plan.

The plan outlined in this report was developed by a team of faculty, staff, and community members with interest and expertise in serving students with intellectual and developmental disabilities. Team members represented a variety of functional areas including accessibility/disability services, faculty in occupational skills programs, career services, and student services. The plan was informed by input from staff at Bethel University who have implemented the BUILD program which served as a model in the development of the program outlined in this report.

Operating definitions guiding the development of this plan include:

Intellectual Disability – This refers to group of disorders characterized by limited mental capacity and difficulty with adaptive behavior, such as managing schedules and routines and/or social interactions. Intellectual disability originates before the age of 18 and may result from physical causes, such as autism or cerebral palsy, or from non-physical causes, such as lack of stimulation and adult responsiveness.

**Developmental Disability** – This is a long-term disability that impacts cognitive ability, physical functioning, or both. These disabilities appear before age 22 and are likely to be lifelong. The term "developmental disability" encompasses intellectual disability but also includes physical disabilities. Some developmental disabilities may be solely physical. Others involve both physical and intellectual disabilities stemming from genetic or other causes, such as Down's syndrome and Fetal Alcohol Syndrome.



### **Occupational Skills Programs**

Ridgewater College (Willmar and Hutchinson) and Central Lakes College (Brainerd and Staples) have long offered an Occupational Skills Program. These programs are designed to prepare students with disabilities to work independently and live successfully in the community. The Occupational Skills Program offers:

- Vocational training in a community-based training site
- Life skills courses
- Job-seeking/job keeping courses
- Applied job search

Neither of the colleges offer on-campus housing. However, the team felt that it was important to provide background on these programs and resources already developed to better understand the potential scope and challenges for additional programming in the state.

Ridgewater<sup>1</sup> offers two options for students. A 26 credit certificate or a 32 credit diploma which provide students options that will best serve their educational and employment goals. Of the 11 students who graduated in 2015, 89% found employment as dishwashers, cashiers, assembly, personal care aides, and childcare workers. Central Lakes<sup>2</sup> offers students a 34-credit program only with the same options to choose elective courses. Job titles for OSP graduates include, but not limited to: stock person, line worker, housekeeping, waiter/waitress, dishwasher, restaurant attendance, dietary aide, retail associate, janitor/custodian, and ride operator.

In July of 2011 a new federal ruling on "Gainful Employment" brought the question of financial aid for Occupational Skills students into question. The ruling stated that in order to be eligible for funding under the Financial Student Aid programs, an educational program must lead to a degree (associate, bachelor's, graduate, or professions) or prepare students for "gainful employment in a recognized occupation". Both Ridgewater and Central Lakes are designated as a Comprehensive Transition and Postsecondary (CTP) program (see Appendix C) which allows their students to be eligible for financial aid.

In October 2010, Central Lakes College was awarded a 5-year, \$2,199,895 million grant by the Office of Postsecondary Education, U.S. Department of Education under the federal Transitions Program for Students with Intellectual Disabilities (TPSID). Central Lakes College was one of 27 institutions of higher education in 23 states who received this grant. The funding allowed Central lakes to partner with Ridgewater College, and the University of Minnesota, a federally designated University Center for Excellence in Developmental Disabilities. Under the grant, the

<sup>&</sup>lt;sup>2</sup> http://www.clcmn.edu/occupational-skills-diploma-2/



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<sup>&</sup>lt;sup>1</sup> http://ridgewater.edu/programs-and-majors/technical-programs/Occupational-Skills

three institutions established a comprehensive and inclusive model called *Check and Connect*<sup>3</sup> for engaging and retaining students with intellectual disabilities in higher education programs. The *Check and Connect* programs provides students with a coach who promotes positive outcomes by routinely meeting with the students and offering support in a number of ways:

- Check-in regularly with students to discuss how school, work, social, and home lives are going
- Monitor student's attendance, grades, and progress in school
- Timely interventions to ensure student achievement through graduation Work with Faculty, Disability Services, CLC administrators and other support staff to help students with ID to be successful
- Problem solve with students when having difficulties with home, social, academic, or vocational lives
- Assist students in finding outreach services or supports, as needed
- Provide follow-up and support in the summer months and after graduation
- Sponsor social events to help students socialize and become integrated in school and community life

### Student testimonials can be found at:

- Ridgewater College <a href="http://ridgewater.edu/programs-and-majors/technical-programs/Occupational-Skills/Pages/Meet-the-Students.aspx">http://ridgewater.edu/programs-and-majors/technical-programs/Occupational-Skills/Pages/Meet-the-Students.aspx</a>
- Central Lakes College https://youtu.be/9jJp09zlNqY

<sup>&</sup>lt;sup>3</sup> http://www.checkandconnect.org/



### **Proposed Plan: Program Structure and Elements**

As outlined in legislation, the plan for creating a Minnesota State program for students with intellectual and developmental disabilities (PSIDD) must include the following components:

- curriculum
- leadership development and community engagement
- peer mentoring
- residential experience
- partnerships and program support structures
- admissions

The program structure and elements described are consistent with the requirements outlined in the legislation. The following sections describe in detail each element of the program including curriculum, leadership development and community engagement components, peer mentoring, the residential experience, partnerships, and admissions processes.

#### Curriculum

Required curriculum must include core courses that include life skills, financial literacy skills, independent living skills, and practical application of internships/work based & skills-based learning; including rigorous academic work in the students chosen field of study. It is recommended that, as much as possible, these skills be imbedded into courses that already exist in four year colleges such as first year experience courses and other such courses that include student success components. It is strongly recommended that campuses provide an orientation specific to program participant needs aside from any other scheduled orientations for the campus at large. Program orientation will provide participants the opportunity to become acquainted with the campus, student services, computer access, transportation, acclimation with housing/living arrangements, etc. prior to the semester beginning to assist in their transition to the post-secondary environment. In addition these programs should include initial introduction to basic life skills, financial literacy, and independent living skills.

Life skills core curriculum components should include as a minimum:

- Differences between high school and college
- Student life involvement
- Time management
- Prioritizing (school, work, relationships, social activities, family)
- Organization
- Goals setting
- Problem solving
- Know your learning style and how to use your strengths in work and school



- Know your interests
- Exploring careers that fit interest, aptitude, and learning style
- Values and choices
- Learning how to learn
- Preparing for class
- Study strategies
- Test taking skills
- Teamwork
- Critical thinking
- Communications (verbal, written, body language, social media)
- Diversity awareness Gender, age, culture, race
- Self-advocacy skills
- Asking for help in an appropriate way
- Getting along with roommates
- Managing stress

Financial literacy skills core curriculum components should include as a minimum:

- Money management: Long term and short term budgeting
- How to reduce expenses
- Credit cards
- Food: fast food vs. cooking

Independent living skills core curriculum components should include as a minimum:

- Finding and accessing community resources
- Eating a balanced diet
- Using the library
- Service learning
- Job Shadowing
- Career Exploration
- Use and abuse of alcohol and drugs
- Understanding, identifying, and reporting sexual harassment
- Understanding, identifying, and seeking help for emotional pain and depression

Program sequencing is dependent upon the combination of life skills, financial literacy skills, and independent literacy skill components in addition to professional skills building experiences provided both on and off campus. Establishing partnerships to provide experiential education should be done in accordance with best practices and guidance from relevant labor laws. In order for credit-based internships to be offered without pay, substantial learning must be provided to the student.



An additional variable to consider regarding sequences of curriculum includes credit course offerings in the student's chosen field of study. A student's opportunity to engage in rigorous academic work within a chosen field of study is dependent upon standardized tests used in admission processes. The most sustainable credentials are those that align and are recognized by a specific industry (e.g.: Nursing Assistant Registered-CNA/NAR; Food Safety for Culinary; etc.). A Diploma or Associate's degree for a 2-year course of study at full-time, residential status is viable from a major where Universal Design for Learning (UDL) is implemented and instructional strategies do not lower quality or standards of instruction. Students with intellectual and/or developmental disabilities should pursue a major that best suits their interests, motivation, and aptitude. In addition, core courses are required as defined in legislature and described in this document. Reasonable and appropriate accommodations may not fundamentally alter the nature of the course; ensuring program participants meet the same objectives as other students in the course.

Due to this potential challenge, the work group found value to providing a sequence involving a higher number of for-credit program specific offerings and a more limited number of for-credit academic specific offerings. Presenting two options for curriculum sequencing provides flexibility in matching students with an appropriate program option meeting their individual needs. An option involving reduced credit producing coursework and a second option involving a higher number of credit producing courses is outlined below. Either option includes strong academic programming; however, the level of rigor is varied based upon student needs.

Program option involving a more limited number of for-credit course offerings:

- Year 1
  - Semester 1 Students engage in professional skill-building experiential learning on- and/or off-campus with topics such as:
    - Workplace etiquette and employee behavior, education on occupation exploration tied to major, resume preparation, facts on the interview process, appropriate social media use in workplace and outside (HIPAA confidentiality for CNA), and more
  - Semester 2 Students engage in work-based experiential learning with onand/or off-campus employers such as:
    - Employers and/or employees offer coaching on cold calling, resume reviews, mock interviews, workplace safety, and more
    - Employer's host students for site visits and tours, recruitment education related to onboarding for internships/employment, and more
- Year 2
  - Semester 1 Students engage in work-based experiential/service learning with on- and/or off-campus employers or Students engage in Academic Program for-credit optional or required experiences



- Employer's and community organizations offer students volunteer experiences and/or job shadow and/or go on-site with a job coach
- An option for program faculty/staff to assist students to obtain oncampus Work-Based employment with work-study eligibility under financial aid and/or departmental funding positions as student workers
- Another option as according to individual major planning, there may be 1 or more credentials obtained with requisite workplace learning/internship
- Semester 2 Students engage in academic program for-credit option or required experiences or students engage in employment option
  - According to individual major planning, there may be 1 or more credentials obtained with requisite workplace learning to obtain
  - Other students may seek a part-time employment experience in field of study or related occupation

Program option involving higher number of for-credit course offerings:

- Year 1
  - Semester 1 Students engage in professional skill-building experiential learning on- and/or off-campus with topics such as:
    - Workplace etiquette and employee behavior, education on occupation exploration tied to major, resume preparation, facts on the interview process, appropriate social media use in workplace and outside (e.g. HIPAA confidentiality for CNA), and more
    - Employers and/or employees offer coaching on cold calling, resume reviews, mock interviews, workplace safety, and more
    - Employer's host students for site visits and tours, recruitment education related to onboarding for internships/employment, and more
  - Semester 2 Students engage in work-based experiential learning with onand/or off-campus employers such as:
    - Employer's and community organizations offer students volunteer experiences and/or job shadow and/or go on-site with a job coach
    - An option for program faculty/staff to assist students to obtain oncampus Work-Based experience with work-study eligibility under financial aid and/or departmental funding positions as student workers
- Year 2
  - Semester 1 Students engage in academic program for-credit optional or required experiences



- According to individual major planning, there may be 1 or more credentials (e.g. CNA, Phlebotomy, Food Safety) obtained with requisite workplace learning to obtain
- Semester 2 Students engage in academic program for-credit optional or required experiences or Students engage in Employment Option
  - According to individual major planning, there may be 1 or more credentials obtained with requisite workplace learning/internship to obtain
  - Other students may seek a part-time employment experience in field of study or related occupation

From the very onset of working with a student a focus on student academic, behavioral, social, program-completion, and post-program employment and independent living outcomes is necessary to meet the goal that students participate in current course offerings, with support, and attain an exit credential (industry skills certificate, AA degree). Continuous evaluation and feedback is central to the implementation and sustainability of a successful model. Feedback from faculty/instructors, student support services staff, outside agency personnel, families, and students themselves is essential in ensuring that issues and challenges, as they arise, are fully addressed. Two major evaluation strategies include implementation evaluation and outcome evaluation. Continuous implementation evaluation provides the continuous feedback to college staff, and the outcome evaluation focuses on student success in relation to college participation and eventual employment in the community.

### **Advisory Committee**

Essential to improve and expand services to students with intellectual and/or developmental disabilities within the Minnesota State system is the state and local partnerships provided by the current State Advisory Committee that meets twice a year. The state advisory committee was re-established in 2010 for the purpose of supporting the Transition to Postsecondary for Students with Intellectual and Developmental Disabilities demonstration project (TPSID), as well as discussing possible future adoptions and replications of the model in other two- and four-year colleges and universities. The advisory committee can support the development of newly developing programs under the law.

### **Leadership Development and Community Engagement**

It is critical that all PSIDD program students become fully integrated into the campus community and each chosen campus should make every effort to provide a safe and inclusive environment for its students. Either the Director of Student Life or the Student Activities Coordinator would have the responsibility of creating pathways for program participant engagement in campus-wide activities. Several student activities will be coordinated exclusively for the students each semester in order to establish a relationship with the Student Life Department. It is important that efforts are made both to inform and invite program participants to campus events and activities. The Student Life Department will be involved in



orientation and Welcome Day activities to create an immediate connection with program participants.

Face to face interaction has proven to be the most effective method of motivating student involvement and it is recommended that campus activities are advertised in this format whenever possible to actively encourage participation among program participants. Participation in student activities positively influences satisfaction with the college experience and likelihood of college completion. In addition to personal methods of fostering student participation in activities, typical methods of advertising activities should also be used such as student emails, posters, and electronic signage.

The program participants are encouraged to attend activities planned by program staff and peer mentors as a cohort as part of the structured program. Students are also encouraged to seek out campus activities and events that speak to their individual interests. The program will need to consider transportation options to off-campus activities for students who are not able to transport themselves and incur the costs associated with implementation of transportation options.

The program will need to assess if certain events are accessible to students with intellectual and developmental disabilities. Efforts must be made to ensure that less accessible activities make the necessary accommodations for the program participants. Transportation to and from events can be a large barrier for this group of students, and chosen campuses will need to have a reliable form of public transportation. It is also recommended that program employees become approved to drive campus vehicles and if college mini-buses are available, an approved Class A or B driver's license with a passenger endorsement would be a valuable asset to the program. The student life department and program director will need to ensure that a welcoming and inclusive environment is being fostered at all campus activities.

Many opportunities exist on our college campuses to involve the program participants in leadership development and community engagement activities. It is likely that some students will become involved in such activities as student government and campus clubs which include leadership development and community engagement experiences. A dedicated student organization for program participants should be created on each campus in order to provide additional opportunities for leadership development and community involvement. The student organization experience involves self-governing opportunities including election of officers, working with student government in gaining student organization approval, and collaborating with other organizations to implement community involvement opportunities for all students. Student organization involvement will provide hands on leadership experience running meetings, organizing activities, fundraising, and serving the campus and local community.



The program director will need to be responsible for implementing and assessing the leadership development and community engagement components. These assessments can be done in collaboration with the student life department and service learning coordinator. Community engagement projects should be created for both on and off campus implementation. Several service projects such as nursing home visits, raking yards for the elderly, and highway cleanups should be planned for each academic year and involve participation from the student organization. Students are highly encouraged to contribute to the campus beautification efforts as well as create lasting partnerships with community groups. Each activity or service project is an opportunity to create positive exposure for the program. The program director should consider the appropriate level of intensity and duration of projects.

### **Peer Mentoring**

Active involvement in supportive peer communities is a critical component of a positive college transition and continued success on campus. In addition to peer mentoring received through the residential experience, a team of peer mentors with interest in the program will be established at each host institution to provide general support to program participants in the academic and social aspects of student life. The peer mentor team will increase awareness of existing student services available on campus (advising, tutoring, writing center, financial aid, etc.) and provide support to program participants in seeking out these services. Additionally, peer mentors will be given the responsibility of organizing participation in campus activities based upon the interests of program participants. The availability of student involvement opportunities on campus does not guarantee active participation among the student body. Active participation in campus life is an important component of the PSIDD and specific efforts on the part of peer mentors to foster campus wide engagement among program participants is essential to ensure campus involvement is achieved.

Peer mentors will be selected and supervised by program faculty and staff based upon interest in serving as a peer mentor for students with intellectual and developmental disabilities. Peer mentors will be expected to perform the specific duties outlined in this report and should meet collectively on a regular basis with program faculty and staff to proactively discuss opportunities for program improvement. Peer mentors should be compensated based upon the robust nature of the position. The number of peer mentors hired should be dependent upon the number of students enrolled in the program; however, a ratio of 1 mentor per 2 program participants is recommended. Peer mentors should work collectively in the planning of social programming and coordinating of involvement in campus activities; however, a schedule will be created to provide flexibility in case all peer mentors are not able to attend all planned events.



### **Residential Experience**

The residential experience is an enriching aspect of the collegiate experience providing opportunities for students to experience academic and social benefits. Students involved in the PSIDD will be provided the option of living in college or university residence hall facilities in accordance with the relevant policies regarding residency at each institution. PSIDD sites will be selected based upon the availability of revenue fund housing or affiliated housing options with strong connections to the institution and presence of college or university staff in the management of the residential facility. Residence halls provide space to host program components delivered outside of the classroom including life skill curriculum and social programming.

Resident assistants already in place to serve as peer mentors for residence hall students can serve in the same capacity for program participants providing support with general problem solving and providing information about opportunities to engage in broad programs and activities in existence for all students at each institution. To assist with specific needs of program participates, additional Resident assistants will be hired. Program participants will be required to adhere to the same residence hall policies in existence at each institution. The resident assistants/peer mentors already in place in the residence halls can provide detailed information to program participants about policies and will intervene when policies are violated in accordance with resident assistant procedures already in place. In cases in which program participants may require additional mentoring or support, resources need to be invested into student and professional staff to provide assistance outside of the classroom needs.

If accommodations within the residence hall are necessary, program participants will request accommodations through the existing process defined by each institution. Faculty and staff working with program participants should be made aware of the accommodations procedures in order to help students navigate the process. Institutions need to determine what constitutes a reasonable accommodation and funding must be dedicated to making reasonable facility adjustments that may be required.

Faculty and staff working with program participants who may fall into the category of "vulnerable adults" should receive training specifically addressing protocols in place for reporting suspicions of abuse. A staff member should be identified at each host institution to receive and investigate reports of abuse and work with institution administrators to implement remedies if necessary based upon the investigation. Professional staff hired to manage this program should have responsibility for working with institution colleagues to develop safety and security protocols in order to keep program participants safe.

Strong collaborative relationships should be fostered between residence hall staff, accessibility/disability resource centers, and student conduct/Title IX officers at each host



institution to ensure all faculty, staff, and students involved in the PSIDD are aware of relevant policies and processes.

### **Partnerships and Program Support**

In addition to a state advisory committee, establishing local community-level partnerships is also important to ensure that effective service planning and coordination occurs between secondary special education programs, collaborating community service agencies (vocational rehabilitation, county human services, workforce centers etc.), postsecondary education programs, employers, and students and their families. This level of interagency collaboration is essential, given the multiple needs students with intellectual and/or development disabilities have in relation to their participation in postsecondary education programs. An example of these partnerships, developed in the mid-1980s, the Minnesota Department of Education is the statewide network of Community Transition Interagency Committees (CTICs). The CTICs were established to bring together agencies at the local community level to support students with disabilities in making a successful transition from high school to postsecondary education, employment and independent living.

Additional strategies to ensure support for the program and success of students in the program include:

- Internal Design Team: An internal design team on each campus for the purpose of
  developing student recruitment and outreach strategies; aligning internal support
  services, i.e., disability services, financial aid, student services/advising, etc.; reviewing
  curricula; and developing processes for coordinating services is essential. The design
  team should include community and technical college administrators, advisors, faculty,
  and lead staff.
- Faculty and Staff Professional Development: Providing faculty and staff training on student characteristics and needs, universal design approaches to instruction, accommodations and assistive technology, and strategies that support students' participation in courses is essential. Universal Design for Learning (UDL) is the design of products and environments to be usable by all people, to the greatest extent possible, without need for adaptation or specialized design (Center for Universal Design at North Carolina State University). The principles that are central to UDL address access to the dynamic processes of teaching and learning. UDL requires that faculty not only design accessible information, but also an accessible educational methods that faculty use to highlight critical features, emphasize big ideas, clarify essential relationships, provide graduated scaffolds for practice, model expert performance, and guide and mentor the student. UDL provides a framework to create and implement lessons with flexible goals, methods, materials, and assessments that support learning for all students.



- Ongoing Program Consultation: This involves the development of processes for providing ongoing technical assistance and consultation to faculty and staff as students are involved in courses and programs. Supporting faculty in the use of accommodations, assistive technology, and/or instructional or course modifications is important.
- **Relationship-Building Focus**: Used to develop trust and open communication, nurtured through a long-term commitment focused on students' educational success. This includes using active strategies to establish and develop positive relationships between the student and faculty/ instructor, support services staff, and others.

### **Admissions**

Admission processes for similar programs across the country vary widely and range from program specific applications with very specific criteria to more general institutional applications with options for selecting a variety of programs. In conjunction with the admissions process there was also found to be varied approaches to the accommodations process including engaging directly with existing disability/accessibility resource offices to including this process in the duties of program staff. Some programs also require an interview prior to admission, while others have an optional information session available prior to enrollment.

Confidential information will need to be gathered in order to determine eligibility for the program. This information should be collected and stored in a manner that is consistent with current institutional policy and procedures for students with disabilities. Additionally, reasonable accommodations may need to be made in academic, housing and co-curricular areas. These reasonable accommodations may not alter the core components of a course, or program.

Programs are funded in a variety of ways including federal financial aid, state grants, Medicaid waiver funds, Vocational Rehabilitation funds and private pay. It is important to appropriately classify any potential program in order to be eligible for state and federal funds (see limitations).

It is recommended that the existing admissions process at selected institutions be used along with supplemental application materials that are program specific.

Admission requirements for the program would include:

- Applicant should be at least 18 years old at the start of the program
- Have completed high school with a diploma or equivalent
- Complete application process(es) for the school of choice
- Have practical reading and writing skills



- Have a desire to gain skills for employment and independent living
- Ability to independently navigate campus during class transitions, mealtimes, and other extracurricular activities.
- A documented intellectual and/or developmental disability
- Have completed Accuplacer, ACT or SAT

If accommodations are coordinated through the existing office for disability/accessibility resources or program specific staff they should be involved as early as possible in the admissions process. Building relationships will be critical to bridging the transition from the K-12 special education model to the more self-directed model in higher education.

Financial aid should also follow existing institutional processes. There will likely be additional third party funding sources such as county Medicaid waiver funding and vocational rehabilitation funds, which may require additional coordination through either the institutions finance office or program staff. Institutions hosting these programs will likely need to apply for approval under Title IV as a comprehensive transition and post-secondary program.

In the event that a prospective student believes that they were wrongly denied admission to the program they may use existing grievance procedures within the institution as well as any additional state and/or federal grievance procedures.

Students admitted to the program must attend any general and/or program specific orientation sessions required by the host school.

Upon admission to the program students are assigned two advisors. An academic advisor that will assist the student in selection of courses and a professional advisor that will assist students in all other areas such as career planning, co-curricular activities and other non-course related areas of the college experience. Academic advisors may be hired program staff or faculty members who are actively teaching courses and other advising staff within the college or university. The professional advisor should be working primarily with the students enrolled in this program.

## **Proposed Plan: Resource Requirements**

### **Staffing**

In order to effectively manage the multiple facets of the program, establish the necessary campus and agency partnerships, and meet the needs of the student population, a specific staff team is necessary at each program location. The staffing model at each program location mirrors the staffing model employed by the BUILD program at Bethel University.

Program specific staff required at each host site include:



- Program Director
- Assistant Program Director
- Administrative Assistant
- Faculty
- Resident Advisors (5 working 20 hours per week)
- Peer Mentors (5 working 20 hours per week)

Existing staff at each program location will need to provide critical support in order to ensure the success of the program. The departments program staff will need to collaborate with include:

- Admissions
- Financial Aid
- Accessibility/Disability Resource Center
- Residence Life/Housing
- Student Life
- Title IX Coordinator

Program specific staff serve as a source of support for existing staff in other areas of the institution critical to the success of the program. The level of support may vary between host institutions dependent upon level of staff and other resources.

### **Facility Needs**

Location selection for the program for students with intellectual and/or developmental disabilities will consider the availability of physical resources needed to meet the requirements of the program. In some instances, students admitted to the program may require reasonable accommodations to ensure full participation in both academic and student life aspects of the program. Predicting needed changes to institution facilities is difficult because reasonable accommodations are made based upon the specific needs of the individual student. The costs associated with facility related projects necessary in implementing reasonable accommodations are equally difficult to predict. Costs associated with the implementation of reasonable accommodations are the responsibility of the institution and may include modifications in classrooms, residence halls, and other campuses facilities to ensure full participation for student enrolled in the program.

#### **Program Costs**

The following section details the financial resources necessary to deliver all components of the program for the students with intellectual and/or developmental disabilities. Compensation costs include salary and benefits, based on the contract requirements of each position. Benefits include employer paid insurance (family insurance is assumed), retirement contributions, and FICA.



Each of the four programs will serve a cohort of 10 incoming students each academic year. The first cohort will begin in the 2018-19 academic year (FY2019) and the second one will begin in the 2019-20 academic year (FY2020). If additional cohorts are added, program costs would rise proportionately. Program design, curriculum development, student recruitment, application design and implementation will begin in the 2017-18 academic year (FY2018). Staff and faculty will be hired and begin working in FY2018 as shown in the expenditure section below. FY2018 costs will support program and curriculum development. Full implementation costs for one cohort begins in FY2019 and a second begins in FY2020.

Enrolled students will pay tuition, fees and room and board beginning in FY2019. University revenue estimates are based on average Minnesota State university tuition and fee charges and average room and board during the 2016-17 academic year (FY2017). College revenue estimates are based on average Minnesota State college tuition and fee charges and room and board charges at Vermilion Community College during the 2016-17 academic year (FY2017). No revenues will be generated in FY2018. Tuition and fees and room and board revenues will be collected in the 2018-19 academic year (FY2019) for the first cohort of students at each of the four programs. Tuition and fees and room and board revenues will be collected in the 2019-20 academic year (FY2020) for the two cohorts of students at each of the four programs (one first year cohort and one second year cohort).

The program costs are assumed to be ongoing based on the costs and revenues associated with two-cohorts per program per year, one cohort in the first year of the program and another cohort in the second year of the program. If the program is expanded costs will increase.

| University Program Expenditures           | Startup Costs |           |  |
|---|---------------|-----------|--|
| University Per Program Start-Up Costs     | FTE/Program   | Total     |  |
|   |               | Costs     |  |
| Program Director (MSUAASF Range C Step    | 0.75          | \$63,726  |  |
| 11)                                       |               |           |  |
| Assistant Program Director                | 0.50          | \$37,493  |  |
| (MSUAASF Range B Step 11)                 |               |           |  |
| Administrative Assistant (AFSCME OAS, II) | 0.50          | \$32,676  |  |
| Faculty (IFO Instructor Step 15)          | 0.30          | \$24,565  |  |
| Faculty (IFO Instructor Step 15)          | 0.30          | \$24,565  |  |
| Program supplies, travel, equipment       |               | \$10,000  |  |
| Total costs per program                   | 2.35          | \$193,025 |  |



| College Program Expenditures                | Startup Costs |           |
|---|---------------|-----------|
| College Per Program Start-Up Costs          | FTE/Program   | Total     |
|   |               | Costs     |
| Program Director (MMA Range 15 Step 4)      | 0.75          | \$63,790  |
| Assistant Program Director                  | 0.50          | \$37,116  |
| (MAPE Range 5 Step 6)                       |               |           |
| Administrative Assistant (AFSCME OAS, II)   | 0.50          | \$32,676  |
| Faculty (MSCF, Occupational Skills Faculty) | 0.30          | \$26,582  |
| Faculty (MSCF, Occupational Skills Faculty) | 0.30          | \$26,582  |
| Program supplies, travel, equipment         |               | \$10,000  |
| Total costs per program                     | 2.35          | \$196,745 |

| University Program             | Per Program - | - One       | Per Program -             | - Two Cohorts |
|--------------------------------|---------------|-------------|---------------------------|---------------|
| Expenditures                   | Cohort        |             |                           |               |
| Per Program Costs              | FTE/Program   | Total Costs | FTE/Program               | Total Costs   |
| Program Director               | 1.00          | \$84,968    | 1.00                      | \$84,968      |
| Assistant Program Director     | 1.00          | \$74,986    | 1.00                      | \$74,986      |
| Administrative Assistant (OAS) | 1.00          | \$65,352    | 1.00                      | \$65,352      |
| Faculty                        | 0.50          | \$40,942    | 1.00                      | \$81,883      |
| Faculty                        | 0.50          | \$40,942    | 1.00                      | \$81,883      |
| Resident Assistants (RA)       | 2.50          | \$64,771    | 5.00                      | \$129,542     |
| Mentors                        | 2.50          | \$34,771    | 5.00                      | \$69,542      |
| Program supplies, travel,      |               | \$10,000    |                           | \$20,000      |
| equip.                         |               |             |                           |               |
| Total costs per program        | 9.00          | \$436,604   | 15.00                     | \$588,156     |
|                                |               |             |                           |               |
| College Program Expenditures   | Per Program - | One Cohort  | Per Program - Two Cohorts |               |
| Per Program Costs              |               | Total Costs | FTE/Program               | Total Costs   |
|                                | FTE/Program   |             |                           |               |
| Program Director               | 1.00          | \$85,053    | 1.00                      | \$85,053      |
| Assistant Program Director     | 1.00          | \$74,231    | 1.00                      | \$74,231      |
| Administrative Assistant (OAS) | 1.00          | \$65,352    | 1.00                      | \$65,352      |
| Faculty                        | 0.50          | \$44,303    | 1.00                      | \$88,606      |
| Faculty                        | 0.50          | \$44,303    | 1.00                      | \$88,606      |
| Resident Assistants (RA)       | 2.50          | \$56,571    | 5.00                      | \$113,142     |
| Mentors                        | 2.50          | \$34,771    | 5.00                      | \$69,542      |
| Program supplies, travel,      |               | \$10,000    |                           | \$20,000      |
| equip.                         |               |             |                           |               |
| Total costs per program        | 9.00          | \$414,584   | 15.00                     | \$604,532     |

| FY2019 & FY2020 University Program Per Cohort | Per      | Total     |
|---|----------|-----------|
| Revenue                                       | Student  | Revenue   |
| Tuition & fees (10 students)                  | \$8,028  | \$80,280  |
| Room & board (10 students)                    | \$8,067  | \$80,670  |
| Total per program revenue                     | \$16,095 | \$160,950 |

| FY2018 & FY2019 College Program Per Cohort | Per      | Total     |
|--|----------|-----------|
| Revenue                                    | Student  | Revenue   |
| Tuition & fees (10 students)               | \$5,364  | \$53,640  |
| Room & board (10 students)*                | \$6,990  | \$69,900  |
| Total per program revenue                  | \$12,354 | \$123,540 |



| Net Cost Per Program-       |     |         |     |         |     |         |
|-----------------------------|-----|---------|-----|---------|-----|---------|
| University                  | FY2 | 2018    | FY2 | 2019    | FY2 | 2020    |
| University Program          |     |         |     |         |     |         |
| Expenditures                | \$  | 193,025 | \$  | 436,604 | \$  | 588,156 |
| University Program Revenues | \$  | -       | \$  | 160,950 | \$  | 321,900 |
| Net Program Cost            | \$  | 193,025 | \$  | 275,654 | \$  | 266,256 |

| Net Cost Per Program -       |     |         |     |         |     |         |
|------------------------------|-----|---------|-----|---------|-----|---------|
| College                      | FY2 | 2018    | FY2 | 2019    | FY2 | 020     |
| College Program Expenditures | \$  | 196,745 | \$  | 414,584 | \$  | 604,532 |
| College Program Revenues     | \$  | =       | \$  | 123,540 | \$  | 247,080 |
| Net Program Cost             | \$  | 196,745 | \$  | 291,044 | \$  | 357,452 |

| Net Cost of Four Programs (2 university/2 college) | FY2018    | FY2019      | FY2020      |
|--|-----------|-------------|-------------|
| Expenditures                                       | \$779,540 | \$1,702,376 | \$2,385,376 |
| Revenues   | \$0       | \$ 568,980  | \$1,137,960 |
| Net Cost   | \$779,540 | \$1,133,396 | \$1,247,416 |

### **Financial Resources Summary**

- The net cost of providing a program at one Minnesota State university is estimated at \$193,025 for first year start-up costs in FY2018, \$275,654 for one cohort of 10 students in FY2019, and \$266,256 for two cohorts of 10 students each in FY2020.
- The net cost of providing a program at one Minnesota State college is estimated \$196,745 for first year start-up costs in FY2018, \$291,044 for one cohort of 10 students in FY2019, and \$357,452 for two cohorts of 10 students each in FY2020.
- If four programs were established, two at colleges and two at universities, the net cost of offering the four programs would be: \$779,540 for first year start-up costs (FY2018), \$1,133,396 for the first cohort of students (40 students in FY2019), and \$1,247,416 for two cohorts of students (80 students in FY2020).
- Program costs defined in this analysis do not include expenses necessary to implement reasonable accommodations provided to students enrolled in the program. Costs related to these accommodations are based upon individual student needs and cannot be predicted, but are the responsibility of the institution.
- When the four programs are fully operational and serving 80 students, the estimated per student general fund cost is \$15,593 per student. This compares to \$5,129 in average per student state funding provided to Minnesota State students throughout our system.



### **Considerations and Concerns**

Implementation of the program described requires full funding from the legislature for the costs outlined in this report and for additional expenses that may be incurred in making reasonable accommodations for students admitted to the program. Given current fiscal and staffing resources at all Minnesota State institutions, program implementation could not proceed without a legislative commitment to fund current and future costs associated with the program. A secondary step necessary to implement this plan is the identification of the colleges and universities that will host this program. Selection of the campuses is based on the institution's desire to host such a program, the availability of residence halls, and availability of programs and resources outlined in the plan. Host institutions will commence hiring processes for program staff and provide space and resources for their operation. Program staff, once in place, will begin the process of engaging existing faculty and staff in the development of curriculum, student life elements, and admission processes. This effort requires additional human and financial resources to construct the program and coordinate the various elements critical to its success.

The need for additional resources is a central challenge to the implementation of this plan. Serving the diverse individual needs of learners and preparing students to achieve career goals is central to the mission of Minnesota State. Certain components of this plan fit the mission of Minnesota State; however, the resources needed to successfully implement all components outlined in the plan would require a shift in focus to direct resources to this student population potentially to the detriment of existing programs and services designed to increase student success and gainful employment after graduation.

An analysis of programs across the nation was completed using ThinkCollege.net and other resources. We examined both two and four year institutions, public and private, with and without traditional housing options on campus. The results showed that of those institutions that provide programing specifically for students with intellectual and/or developmental disabilities most were located at two-year institutions and did not include an on-campus residential component. For those institutions that do offer housing they offer both on and off campus options.

Additional challenges identified with this plan that must be overcome include:

- Minnesota State has a limited number of campuses that have a residential component which limits the number of potential sites where a program such as this could be implemented.
- The potential pool of students that has been identified are also classified as vulnerable adults which adds additional liability issues. The institutions, individuals and



- parents/guardians will need to strongly consider what level of risk they are comfortable with before entering such a program.
- Minnesota has adopted specific programming criteria that limit duplication of programs within geographic proximity.
- Federal financial aid rules now require that students be working toward a specific occupation through their program of choice. Programs such as OSPs have been determined not to meet the threshold of "gainful employment in a recognized occupation", which then requires them to apply for status as a Comprehensive Transition Program.<sup>4</sup>
- Enrollment in rigorous coursework in the student's chosen field of study will depend upon placement exam scores.
- It has not been determined if reasonable accommodations would be sufficient without fundamentally altering the nature of the course area to support students with intellectual and/or developmental disabilities.
- Institutions hosting this program may not have existing faculty and/or staff with necessary training and skill to provide appropriate services to students with intellectual and/or developmental disabilities.
- Institutions hosting this program may not have existing faculty and/or staff to establish and maintain partnerships with off campus experiential learning sites providing work experiences, internships, and/or skill based activities.
- Work experiences meeting student's needs may be dependent upon availability, employer policy, and employer interest.
- The level of student demand is unknown at this time.
- Two year and four year institutions have different admission requirements.
- Risk assessment is needed for individuals and families.
- More analysis is required from housing professionals to determine potential facility, staffing, and programmatic modifications to maximize the benefit of the residential component for program participants.

<sup>&</sup>lt;sup>4</sup> See appendix for copy of the financial aid handbook.



### **Summary**

Providing access to higher education for students with intellectual and/or developmental disabilities is a laudable goal and one Minnesota State has pursued most notably in the form of occupational skills programs at Ridgewater College and Central Lakes College. The plan described in this report details a path forward in developing a broader program for students with intellectual and/or developmental disabilities inclusive of the various components outlined in the legislation prompting this work.

Barriers to the implementation of this plan include the significant level of new financial and human resources required to successfully manage the various components of the program. Without new resources dedicated to this program, existing funding must be diverted to this program which would jeopardize the mission of Minnesota State to provide programs and services designed to increase student success and prepare students to reach their personal and career goals. With adequate staffing, funding, and support from institutional and legislative partners, the plan described will provide a beneficial academic and student life experience for students with intellectual and/or developmental disabilities seeking higher education within Minnesota State.



# Appendix A Programs by State

| STATE       | NUMBER OF PROGRAMS | PUBLIC    | PRIVATE   | RESIDENTIAL | HOUSING<br>TYPE |
|-------------|--------------------|-----------|-----------|-------------|-----------------|
| Alabama     | 2                  | 2-YEAR: 0 | 2-YEAR: 1 | YES: 1      | ON-CAMPUS:      |
|             |                    | 4 YEAR: 1 | 4-YEAR: 0 | NO: 1       | OFF-CAMPUS: 1   |
| Alaska      | 1                  | 2-YEAR: 0 | 2-YEAR: 0 | YES:        | ON-CAMPUS:      |
|             |                    | 4 YEAR: 1 | 4-YEAR: 0 | NO: 1       | OFF-CAMPUS:     |
| Arkansas    | 2                  | 2-YEAR: 1 | 2-YEAR: 0 | YES: 1      | ON-CAMPUS:      |
|             |                    | 4 YEAR: 1 | 4-YEAR: 0 | NO: 1       | OFF-CAMPUS: 2   |
| Arizona     | 2                  | 2-YEAR:   | 2-YEAR: 1 | YES: 1      | ON CAMPUS: 1    |
|             |                    | 4 YEAR: 1 | 4-YEAR:   | NO: 1       | OFF CAMPUS:     |
| California  | 14                 | 2-YEAR: 9 | 2-YEAR: 3 | YES: 4      | ON-CAMPUS: 2    |
|             |                    | 4-YEAR: 2 | 4-YEAR:   | NO: 10      | OFF-CAMPUS: 1   |
| Colorado    | 2                  | 2-YEAR:   | 2-YEAR:   | YES: 1      | ON-CAMPUS: 1    |
|             |                    | 4-YEAR: 2 | 4-YEAR:   | NO: 1       | OFF-CAMPUS:     |
| Connecticut | 4                  | 2-YEAR: 1 | 2-YEAR: 3 | YES: 2      | ON-CAMPUS: 1    |
|             |                    | 4-YEAR:   | 4-YEAR:   | NO: 2       | OFF-CAMPUS: 1   |
| Delaware    | 1                  | 2-YEAR:   | 2-YEAR:   | YES: 0      | ON-CAMPUS:      |
|             |                    | 4-YEAR: 1 | 4-YEAR:   | NO: 1       | OFF-CAMPUS:     |
| Florida     | 10                 | 2-YEAR: 3 | 2-YEAR: 1 | YES: 5      | ON-CAMPUS: 5    |
|             |                    | 4-YEAR: 6 | 4-YEAR:   | NO: 5       | OFF-CAMPUS: 1   |
| Georgia     | 5                  | 2-YEAR:   | 2-YEAR:   | YES: 4      | ON-CAMPUS: 4    |
|             |                    | 4-YEAR: 5 | 4-YEAR:   | NO: 1       | OFF-CAMPUS: 1   |
| Hawaii      | 3                  | 2-YEAR: 3 | 2-YEAR:   | YES: 0      | ON-CAMPUS:      |
|             |                    | 4-YEAR:   | 4-YEAR:   | NO: 3       | OFF-CAMPUS:     |
| Idaho       | 0                  | 2-YEAR:   | 2-YEAR:   | YES:        | ON-CAMPUS:      |
|             |                    | 4-YEAR:   | 4-YEAR:   | NO:         | OFF-CAMPUS:     |
| Illinois    | 6                  | 2-YEAR: 5 | 2-YEAR:   | YES: 1      | ON-CAMPUS: 1    |
|             |                    | 4-YEAR:   | 4-YEAR: 1 | NO: 5       | OFF-CAMPUS:     |
| Indiana     | 6                  | 2-YEAR: 1 | 2-YEAR:   | YES: 1      | ON-CAMPUS: 1    |
|             |                    | 4-YEAR: 2 | 4-YEAR: 3 | NO: 5       | OFF-CAMPUS:     |
| Iowa        | 3                  | 2-YEAR: 2 | 2-YEAR:   | YES: 1      | ON-CAMPUS: 1    |
|             |                    | 4-YEAR: 1 | 4-YEAR:   | NO: 2       | OFF-CAMPUS:     |
| Kansas      | 2                  | 2-YEAR: 1 | 2-YEAR:   | YES: 1      | ON-CAMPUS: 1    |
|             |                    | 4-YEAR:   | 4-YEAR: 1 | NO: 1       | OFF-CAMPUS:     |
| Kentucky    | 4                  | 2-YEAR: 1 | 2-YEAR:   | YES: 1      | ON-CAMPUS: 1    |
|             |                    | 4-YEAR: 3 | 4-YEAR:   | NO: 3       | OFF-CAMPUS:     |

| Louisiana         | 5  | 2-YEAR: 3  | 2-YEAR:    | YES: 1 | ON-CAMPUS: 1  |
|-------------------|----|------------|------------|--------|---------------|
|                   | 9  | 4-YEAR: 2  | 4-YEAR:    | NO: 4  | OFF-CAMPUS:   |
| Maine             | 1  | 2-YEAR:    | 2-YEAR:    | YES: 1 | ON-CAMPUS: 1  |
|                   | _  | 4-YEAR:    | 4-YEAR: 1  | NO: 0  | OFF-CAMPUS:   |
| Maryland          | 9  | 2-YEAR: 4  | 2-YEAR: 1  | YES: 1 | ON-CAMPUS: 1  |
| a. y.aa           | 3  | 4-YEAR: 4  | 4-YEAR:    | NO: 8  | OFF-CAMPUS:   |
| Massachusetts     | 18 | 2-YEAR: 10 | 2-YEAR:    | YES: 3 | ON-CAMPUS: 3  |
|                   |    | 4-YEAR: 6  | 4-YEAR: 2  | NO: 15 | OFF-CAMPUS:   |
| Michigan          | 2  | 2-YEAR: 1  | 2-YEAR:    | YES: 0 | ON-CAMPUS:    |
| J                 |    | 4-YEAR:    | 4-YEAR: 1  | NO: 2  | OFF-CAMPUS:   |
| Minnesota         | 4  | 2-YEAR: 2  | 2-YEAR: 1  | YES: 2 | ON-CAMPUS: 2  |
|                   |    | 4-YEAR:    | 4-YEAR: 1  | NO: 2  | OFF-CAMPUS:   |
| Mississippi       | 1  | 2-YEAR:    | 2-YEAR:    | YES: 1 | ON-CAMPUS: 1  |
| • •               |    | 4-YEAR: 1  | 4-YEAR:    | NO: 0  | OFF-CAMPUS:   |
| Missouri          | 4  | 2-YEAR:    | 2-YEAR:    | YES: 3 | ON-CAMPUS: 3  |
|                   |    | 4-YEAR: 4  | 4-YEAR:    | NO: 1  | OFF-CAMPUS:   |
| Montana           | 1  | 2-YEAR:    | 2-YEAR:    | YES: 1 | ON-CAMPUS: 1  |
|                   |    | 4-YEAR: 1  | 4-YEAR:    | NO:    | OFF-CAMPUS:   |
| Nebraska          | 2  | 2-YEAR: 1  | 2-YEAR:    | YES:   | ON-CAMPUS:    |
|                   |    | 4-YEAR: 1  | 4-YEAR:    | NO: 2  | OFF-CAMPUS:   |
| Nevada            | 2  | 2-YEAR:    | 2-YEAR:    | YES:   | ON-CAMPUS:    |
|                   |    | 4-YEAR: 2  | 4-YEAR:    | NO: 2  | OFF-CAMPUS:   |
| New Hampshire     | 2  | 2-YEAR:    | 2-YEAR: 2  | YES:   | ON-CAMPUS:    |
|                   |    | 4-YEAR:    | 4-YEAR:    | NO: 2  | OFF-CAMPUS:   |
| New Jersey        | 6  | 2-YEAR: 4  | 2-YEAR:    | YES: 1 | ON-CAMPUS: 1  |
|                   |    | 4-YEAR: 1  | 4-YEAR:    | NO:    | OFF-CAMPUS:   |
| <b>New Mexico</b> | 1  | 2-YEAR: 1  | 2-YEAR:    | YES: 1 | ON-CAMPUS: 1  |
|                   |    | 4-YEAR:    | 4-YEAR:    | NO:    | OFF-CAMPUS:   |
| New York          | 20 | 2-YEAR: 4  | 2-YEAR: 1  | YES: 3 | ON-CAMPUS: 3  |
|                   |    | 4-YEAR: 4  | 4-YEAR: 11 | NO: 17 | OFF-CAMPUS: 1 |
| North Carolina    | 8  | 2-YEAR:    | 2-YEAR:    | YES: 2 | ON-CAMPUS: 2  |
|                   |    | 4-YEAR:    | 4-YEAR:    | NO: 6  | OFF-CAMPUS:   |
| North Dakota      | 1  | 2-YEAR:    | 2-YEAR:    | YES: 1 | ON-CAMPUS: 1  |
|                   |    | 4-YEAR: 1  | 4-YEAR:    | NO:    | OFF-CAMPUS: 1 |
| Ohio              | 6  | 2-YEAR: 1  | 2-YEAR:    | YES: 2 | ON-CAMPUS: 2  |
|                   |    | 4-YEAR: 4  | 4-YEAR: 1  | NO: 4  | OFF-CAMPUS:   |
| Oklahoma          | 0  | 2-YEAR:    | 2-YEAR:    | YES:   | ON-CAMPUS:    |
|                   |    | 4-YEAR:    | 4-YEAR:    | NO:    | OFF-CAMPUS:   |
| Oregon            | 1  | 2-YEAR: 1  | 2-YEAR:    | YES:   | ON-CAMPUS:    |
|                   |    | 4-YEAR:    | 4-YEAR:    | NO: 1  | OFF-CAMPUS:   |
|                   |    |            |            |        |               |

| Pennsylvania   | 9 | 2-YEAR:   | 2-YEAR: 2 | YES: 3 | ON-CAMPUS: 2  |
|----------------|---|-----------|-----------|--------|---------------|
|                |   | 4-YEAR: 5 | 4-YEAR: 2 | NO: 6  | OFF-CAMPUS: 1 |
| Rhode Island   | 3 | 2-YEAR:   | 2-YEAR: 2 | YES:   | ON-CAMPUS:    |
|                |   | 4-YEAR:   | 4-YEAR: 1 | NO: 3  | OFF-CAMPUS:   |
| South Carolina | 5 | 2-YEAR:   | 2-YEAR:   | YES: 5 | ON-CAMPUS: 5  |
|                |   | 4-YEAR: 5 | 4-YEAR:   | NO:    | OFF-CAMPUS: 1 |
| South Dakota   | 1 | 2-YEAR:   | 2-YEAR:   | YES: 1 | ON-CAMPUS: 1  |
|                |   | 4-YEAR:   | 4-YEAR: 1 | NO:    | OFF-CAMPUS:   |
| Tennessee      | 5 | 2-YEAR:   | 2-YEAR:   | YES: 1 | ON-CAMPUS: 1  |
|                |   | 4-YEAR: 2 | 4-YEAR: 3 | NO: 4  | OFF-CAMPUS:   |
| Texas          | 8 | 2-YEAR: 4 | 2-YEAR:   | YES: 4 | ON-CAMPUS: 4  |
|                |   | 4-YEAR: 4 | 4-YEAR:   | NO: 4  | OFF-CAMPUS: 2 |
| Utah           | 2 | 2-YEAR:   | 2-YEAR:   | YES: 1 | ON-CAMPUS: 1  |
|                |   | 4-YEAR: 2 | 4-YEAR:   | NO: 1  | OFF-CAMPUS:   |
| Vermont        | 5 | 2-YEAR:   | 2-YEAR: 1 | YES: 1 | ON-CAMPUS: 1  |
|                |   | 4-YEAR: 1 | 4-YEAR: 3 | NO: 4  | OFF-CAMPUS:   |
| Washington     | 3 | 2-YEAR: 2 | 2-YEAR:   | YES:   | ON-CAMPUS:    |
|                |   | 4-YEAR: 1 | 4-YEAR:   | NO: 3  | OFF-CAMPUS:   |
| West Virginia  | 1 | 2-YEAR:   | 2-YEAR:   | YES: 1 | ON-CAMPUS: 1  |
|                |   | 4-YEAR: 1 | 4-YEAR:   | NO:    | OFF-CAMPUS: 1 |
| Wisconsin      | 4 | 2-YEAR: 2 | 2-YEAR:   | YES: 3 | ON-CAMPUS: 3  |
| _              |   | 4-YEAR:   | 4-YEAR: 2 | NO: 1  | OFF-CAMPUS:   |
| Wyoming        | 1 | 2-YEAR:   | 2-YEAR:   | YES: 1 | ON-CAMPUS: 1  |
|                |   | 4-YEAR: 1 | 4-YEAR:   | NO:    | OFF-CAMPUS: 1 |

Data retrieved from thinkcollege.net



# Appendix B Occupational Skills Program Fact Sheets

also need to fill out an application,

disability, along with a high school

submit an application fee and provide documentation of their

Employers have identified an

in entry level aide/assistant positions. They require individuals

to strive for job longevity.

· Warehouse specialist

· Carpenter's assistant

· Child care assistant

Kitchen assistant

available include:
 Automotive detailing

Shop assistant

Support sales

Custodian

ongoing need for qualified people

who are able to cope in a working

environment and who are prepared

Examples of hands-on training jobs

transcript.

Career Info

# Occupational Skills

www.ridgewater.edu/occupationalskills



### About the Program

The Occupational Skills program is a post-secondary vocational program for students with disabilities that provides training for entry-level, competitive employment. Occupational Skills combines community-based vocational training with personal management classes on campus.

The Occupational Skills program offers:

- Vocational training in a community-based training site
- · Life skills courses
- · Job seeking/job keeping courses
- Applied job search

Occupational Skills students have access to all student services at Ridgewater College such as financial aid, counseling, the Academic Support Center, and all social and recreational activities.

### **Application Process**

Individuals interested in applying for this program should contact Mary Benson at 320-222-8041 or mary.benson@ridgewater.edu to schedule a recommended informational meeting. Students will

### Degrees & Awards

Occupational Skills Diploma - 32 credits Certificate - 28 credits

# Program Distinctions

- ONE of only TWO programs in MINNESOTA
- STRONG COMMUNITY PARTNERSHIPS and SUPPORT
- CARING, NURTURING, EDUCATIONAL ATMOSPHERE

Willmar Campus

Make *your* impact



800-722-1151 www.ridgewater.edu



Ridgewater College, a member of Minnesota State

Ridgewater College is an affirmative action, equal opportunity employer and educator. This document is available in alternative formats to individual with disabilities, consumers with hearing or speech disabilities may contact us via their preferred.





#### **Our Mission**

To prepare students with disabilities to work independently and live successfully in the community.

### **Occupational Overview**

The Occupational Skills Program provides post-secondary, employment "Soft Skills" training for persons with mild to moderate disabilities. The program is geared toward individuals who can possess the ability to work competitive entry-level employment, but may find it difficult to meet the rigor of a traditional college program. Work experiences as well as coursework to support independence in the community are the main components of the program.

### What is the Program Like?

OSP is a nine-month, technical college diploma program, staffed by one coordinator/instructor and one laboratory assistant.

Specific skills needed for employment are taught at the community business, where students receive training. Coursework in the classroom reinforces basic work skills learned at the employment site, which increases student success at any worksite. Other skills outcomes taught in the classroom include Communication, Problem Solving and Decision Making. Students complete 32 required course credits in the department, and a minimum of 2 required elective credits for a total of 34 credits.

#### **Career Opportunities**

Job titles for OSP graduates include, but are not limited to: Stock person, Line Worker, Housekeeping, Waiter/ Waitress, Dishwasher, Restaurant Attendant, Dietary Aide, Retail Associate, Janitor/Custodian, Ride Operator.

### What Else?

- Students work approximately 12 hours a week at a business or on-campus work site to gain work experience.
- OSP Staff strive to connect student with resources and services needed in the community to promote individual independence.
- OSP curriculum is work based. Skills are taught in the classroom and community during core times.
- While attending Occupational Skills Program, students have the opportunity to be involved with college experiences and groups that naturally form at college.



- OSP is not a supervised independent living program. Central Lakes College does not
  offer dormitory living for students. Students are responsible for securing their own
  housing. Housing options within walking distance of the college are discussed at the
  student's intake meeting and orientation.
- All services the student needs after school hours must be arranged by the student and their parents/guardians or case workers. Examples include physical or mental health needs, supported housing, semi-independent living skills training, etc. Meeting these needs is not the responsibility of the Occupational Skills Program Department or Central Lakes College. Information is shared about these resources at student orientation in the spring before attending OSP. It is strongly recommended that all after school services be in place before the first day of college attendance.
- Students may benefit from ongoing support and services available through your home county's Department of Rehabilitation Services and County Case Management, if applicable.
- Dial-A-Ride public transportation is available Monday-Friday from 7 a.m. 4 p.m. Local taxi service is also available.

Am I ready for the responsibilities and temptations that arise in college life? This is an informal checklist of skills that students in OSP use every day.

**Self-Management** – Getting to school and work on time and being prepared for daily demands. Basic organization and social skills. Taking care of personal needs including hygiene, nutrition, sickness and needs related to your disability.

**Basic Safety Skills** – Knowing how to lock an apartment door and, how to respond to strangers, how to behave in public, how to say "No" in risky situations, safe cooking skills and pedestrian skills. How to appropriately utilize public services such as emergency room and police.

**Advocacy Skills** – Knowing about your disability and accommodations needed in the workplace. Asking for what you want or need to successfully complete coursework and be competent in the workplace. Ability to stand up for yourself when there is peer pressure.

### Come Visit Us!

Informational Sessions are available from September through May at Central Lakes College, in room W117. Contact OSP personnel for a list of dates and times of the monthly sessions. Reservations are not required to attend.

Patty Sloan
OSP Coordinator
800-933-0346, ext. 8075
218-855-8075
psloan@clcmn.edu



Tim Leskey
OSP Lab Assistant
800-933-0346, ext. 8077
218-855-8077
tleskey@clcmn.edu

### **Application Process**

September 1<sup>st</sup>, is the first date to apply for OSP acceptance into the program for the following fall. Applicant completes all portions of the application. Be sure to designate OSP as the program of study. A \$20, non-refundable application fee is required.

Phase 2 packets for OSP admissions process is sent out and completed with the applicant gathered information to support competitive entry level employment and disability documentation. This information is reviewed by the OSP department. If applicant meets the criteria and there is an available seat open in the program, the applicant will be accepted into the program for the following fall semester.

Applicants are then contacted to arrange an Intake Meeting at Central Lakes College with OSP faculty, to further share information and discuss expectations of the program.

All accepted students are required to attend an orientation session in May.



# Appendix C Comprehensive Transition Program Guidelines

### CIP Codes and how this might affect programing and courses

CIP CODE: **32.0107** (Ridgewater)

https://nces.ed.gov/ipeds/cipcode/cipdetail.aspx?y=55&cipid=88956 -- DEVELOPMENTAL

**CODE** 

#### **Detail for CIP Code 32.0107**

Title: Career Exploration/Awareness Skills.

**Definition:** A program that focuses on the linkage between individual capabilities and needs and the job market. Includes instruction in the variety and scope of available employment, how to access job information, and techniques of self-analysis. This CIP code is not valid for IPEDS reporting.

- ■32) BASIC SKILLS AND DEVELOPMENTAL/REMEDIAL EDUCATION.
  - o □ 32.01) Basic Skills and Developmental/Remedial Education.
    - 32.0101) Basic Skills and Developmental/Remedial Education, General.
    - 32.0104) Developmental/Remedial Mathematics.
    - 32.0105) Job-Seeking/Changing Skills.
    - 32.0107) Career Exploration/Awareness Skills.
    - 32.0108) Developmental/Remedial English.
    - 32.0109) Second Language Learning.
    - 32.0110) Basic Computer Skills.
    - 32.0111) Workforce Development and Training.
    - 32.0199) Basic Skills and Developmental/Remedial Education, Other.

<u>NOTE:</u> Application for Title IV Approval of a Comprehensive Transition and Postsecondary Program can be found at <a href="https://ifap.ed.gov/.../062110TitleIVEligibility">https://ifap.ed.gov/.../062110TitleIVEligibility</a>
The E-App can be accessed at: (http://eligcert.ed.gov).



# Appendix D Minnesota State Board Policy 3.36.1

Steps to take in developing new programs:

Refer to Minnesota State Board Policy 3.36.1 (specifically part 4 and part 5):

https://www.mnscu.edu/board/procedure/336p1.html

In addition, an example of the steps to take to develop a program are as follows:

- Idea
- Discuss with department faculty and chair
- Bring idea to dean
- Develop curriculum appropriate for award offered (include MnTC, etc.)
- Calculate costs for program
- Determine labor market need for students trained in field
- Check student interest in program
- Check for unnecessary duplication (is someone else offering the program?)
- Get Advisory Board input for technical programs
- Bring to Curriculum Committee/AASC for approval
- Enter proposal into Program Navigator
- Dean signs off
- CAO signs off
- President signs off
- Academic Program Staff Reviews and approves
- System Director for Academic Programs reviews and approves
- Associate Vice Chancellor for Academic Affairs reviews and approves
- New program added to Program Inventory



# Appendix E Student Financial Aid Components of Programs

The Occupational Skills programs in the state of Minnesota have been around for 25 + years. The students enrolled in the programs have received federal financial aid. In July of 2011 a new federal ruling on "Gainful Employment" brought the question of financial aid for Occupational Skills students into question. The ruling stated that in order to be eligible for funding under the FSA programs, an educational program must lead to a degree (associate, bachelor's, graduate, or professions) or prepare students for "gainful employment in a recognized occupation". A recognized occupation is one that is:

- Identified by a Standard Occupational Classification (SOC) code established by the Office of Management and Budget or an Occupational Information Network O\*NET-SOC code established by the Department of Labor and available at O\*NET Online at <a href="http://www.onetonline.org/or">http://www.onetonline.org/or</a>
- Considered by ED in consultation with the Department of Labor, to be a recognized occupation. Please not that if the title of your program does not clearly indicate the specific occupation that the program prepares the student for, you must provide that information on the school's E-App

Because the Occupational Skills Programs did not prepare students for one specific occupation (instead they prepare students for many different entry level jobs) it was decided that in the Minnesota State system that they did not meet the guidelines of "gainful employment". So a new avenue was pursued by the Occupational Skills Programs. That new avenue was to apply to be a Comprehensive Transitional Program (CTP).

Ridgewater Occupational Skills Program met the guidelines to become a Comprehensive Transition Program. Students receive financial assistance to attend college from the following:

- Federal Financial Aid with the exclusive of student loans.
- Vocational Rehabilitation Services students are encouraged through the orientation process to apply for this program. It is done on a voluntary basis. VRS has helped students with tuition (after reviewing the student's award amounts through FAFSA), purchasing of books, and transportation needs.
- County Social Services assist students in housing needs, if they qualify under their guidelines. Students have lived in Corporate and Family foster care. This is usually paid through the MA waiver program. Other students have qualified for livings skills or personal care assistance. This form of financial assistance is very individualized and is based on the student's personal needs and skills.
- Community Scholarships (Lions, American Legion, etc.).
- Private pay.
- Alternative private loans.



Application for Title IV Approval of a Comprehensive Transition and Postsecondary Program If an institution wishes to have a Comprehensive Transition and Postsecondary (CTP) Program determined to be an eligible program for the Federal Pell Grant, FSEOG, and FWS programs, it must submit an updated Electronic Application for Approval to Participate in the Title IV Federal Student Aid Programs (E-App) to the Department (34 CFR 600.20). The E-App can be accessed at (<a href="http://eligcert.ed.gov">http://eligcert.ed.gov</a>). After submitting the electronic application, the institution must mail the signed signature page to the Department and submit, via email, a detailed description of the program, as described below, along with any other requested supporting documentation.

The detailed description, not to exceed thirty pages, should indicate how the program meets all of the definitional components of a CTP Program, as outlined in item (1), below, as well as the additional program eligibility components outlined in (2) through (5) below.

- (1) (a) The Comprehensive Transition and Postsecondary Program is delivered to students physically attending the institution, but may include off-campus activities;
  - (b) The Comprehensive Transition and Postsecondary Program is designed to support students with intellectual disabilities who are seeking to continue academic, career and technical, and independent living instruction at an institution of higher education in order to prepare for gainful employment;
  - (c) The Comprehensive Transition and Postsecondary Program includes an advising and curriculum structure;
  - (d) The Comprehensive Transition and Postsecondary Program requires students with intellectual disabilities to have at least one-half of their participation in the program, as determined by the institution, focus on academic components through one or more of the following activities:
    - (i) Taking credit-bearing courses with students without disabilities;
    - (ii) Auditing or otherwise participating in courses with students without disabilities for which the student does not receive regular academic credit;
    - (iii) Taking non-credit-bearing, non-degree courses with students without disabilities;
    - (iv) Participating in internships or work-based training in settings with individuals without disabilities; and
  - (e) The Comprehensive Transition and Postsecondary Program provides students with intellectual disabilities opportunities to be socially and academically integrated with non-disabled students to the maximum extent possible.
- (2) The institutional policy for determining whether a student enrolled in the program is making satisfactory academic progress;
- (3) The number of weeks of instructional time and the number of semester or quarter credit hours or clock hours in the program, including the equivalent credit or clock hours associated with noncredit or reduced credit courses or activities;



- (4) A description of the educational credential offered (e.g., degree or certificate) or identified outcome or outcomes established by the institution for all students enrolled in the;
- (5) A copy of the letter or notice sent to the institution's accrediting agency informing the agency of its Comprehensive Transition and Postsecondary Program. The letter or notice must include a description of the items in paragraphs (1) through (4) of this section.

### **Application Process Overview**

The Department accepts applications for approval online and on a rolling basis. Institutional applications will be reviewed by the Department to ensure that the application is properly completed, to determine whether the institution can be considered for adding an additional program, and to determine whether the program meets basic Title IV eligibility requirements.

The detailed information about the institution's CTP Program will be reviewed by an independent panel of Field Reviewers, who will offer recommendations to the Department regarding the program's alignment with the regulatory requirements for these programs. It is imperative that the financial aid administrator and the program administrator communicate to ensure that all of the required elements are included in the application. Otherwise, the Department may need to contact the institution to ascertain or clarify information to facilitate the review of the application, delaying the program's approval.

Applicants are encouraged to provide evidence of how their program aligns with each of the elements described above. For example, institutions may want to submit course syllabi, catalogue descriptions, informational materials, recruitment bulletins, and assessment protocols. Any additional information submitted by an institution will count toward the thirty-page limit.

As with all other eligible programs, institutions must reapply to the Department when the program changes. Examples that could warrant reapplication include: changes in course sequence or content, changes in the length of time that students take to fulfill the program requirements, and changes in the educational credential offered.

Please note that applicants must include the names and contact information of the institutional program contact or other institutional contact who can answer specific questions about the CTP program.

#### Accreditation

It is anticipated that, over time, institutional accreditors will include the CTP Program within the scope of the institutional accreditation review process. Information that the institution



receives from the accrediting agency should be included in the initial and any reapplication to the Department.

### **Student Eligibility**

Institutions must obtain documentation substantiating that the student meets the definition of a "student with an intellectual disability," as defined in 34 CFR 668.231. That documentation must demonstrate both that the student has an intellectual disability and that they are or were formerly eligible to receive special education and related services under the Individual with Disabilities Education Act (IDEA).

This requirement may be satisfied by a record from a local educational agency indicating that the student is or was eligible for special education and related services under IDEA and that the student has an intellectual disability. If that record does not specifically identify the student as having a specific intellectual disability, the institution must obtain additional documentation that the student has an intellectual disability, such as:

- A documented, comprehensive, and individualized evaluation and diagnosis of an intellectual disability by a psychologist or other qualified professional, or
- A record of the disability from a local or State educational agency or government agency that identifies the intellectual disability.

Furthermore, Title IV funds may only be awarded to students who meet the general student eligibility requirements for Title IV programs provided in 34 CFR 668.31 except for the requirements in 34 CFR 668.32(a), (e), and (f). With regard to these requirements, a student in each CTP Program:

- Need not be enrolled in a program that leads to a degree or certificate;
- Need not possess a high school diploma, a recognized equivalent of a high school diploma, or have passed an approved ability to benefit test; and
- Must be making satisfactory academic progress according to the institution's published standards for students enrolled in its CTP Programs; however, the satisfactory academic progress policy may be different for students enrolled in CTP Programs than the policy that governs the rest of the student body.

If you have questions about the application process for CTP Programs, contact the School Participation Team (SPT) for your state. The telephone numbers for the SPTs can be found at www.eligcert.ed.gov.



# Appendix F Federal Student Aid Manual

https://ifap.ed.gov/ifap/byAwardYear.jsp?type=fsahandbook&awardyear=2015-2016



# Appendix G Additional Resources

Additional resources helpful in constructing internships are provided below.

- <a href="https://www.shrm.org/hrdisciplines/staffingmanagement/articles/pages/labor-laws-intern-employee.aspx">https://www.shrm.org/hrdisciplines/staffingmanagement/articles/pages/labor-laws-intern-employee.aspx</a>
- <a href="http://www.naceweb.org/advocacy/position-statements/united-states-internships.aspx">http://www.naceweb.org/advocacy/position-statements/united-states-internships.aspx</a>
- <a href="http://www.naceweb.org/spotlight/index.aspx">http://www.naceweb.org/spotlight/index.aspx</a>
- <a href="http://www.naceweb.org/job-market/internships/exploring-the-implications-of-unpaid-internships/?utm\_source=twan&utm\_medium=email&utm\_content=txt-head&utm\_campaign=resources">http://www.naceweb.org/job-market/internships/exploring-the-implications-of-unpaid-internships/?utm\_source=twan&utm\_medium=email&utm\_content=txt-head&utm\_campaign=resources</a>

