

**Department for the Blind and Vision Impaired
Vocational Rehabilitation Program**

**Policy and Procedures Directive
DS-PPD-19-10
August 1, 2019**

To: Vocational Rehabilitation Counselors
Regional Managers

Cc: Ray Hopkins, Commissioner
Rick Mitchell, Deputy Commissioner for Services

From: Pam Hinterlong, Director of Vocational Rehabilitation and Workforce
Services

This Policy and Procedures Directive (PPD) serves to inform staff that the policy and procedure listed below are new VR policy and procedure. This Policy Directive supersedes any previous PPD's as well as any policy manual references. Implementation of this PPD should occur immediately.

Below is a summary of the key updates that the VR staff should take note of. Please refer to the VR Policy and Procedure manual for a more complete review of the revisions.

Chapter 1: Referral and Application

1. **Initial Interview:** Additional language has been added to further clarify the goal of the initial interview.
2. **Use of the "Initial Interview and Application Guide":** A new document (Initial Interview and Application Guide) has been approved to replace the Preliminary Vocational Survey (PVS). The new Guide may be found in the DBVI Document Repository. The Guide will be used by the VR counselor to structure the initial interview. Language regarding use of the PVS has been deleted and new language has been added regarding use of the new Guide. The VR counselor will be responsible for documenting the results of the initial interview in the text boxes found in the application data page in AWARE.

Chapter 4: Eligibility Determination

1. **Waiver of Eligibility Determination:** Current policy and procedure regarding the extension of eligibility determination requires the VR counselor and the individual to agree to a need to extend the eligibility determination period beyond the federally required 60 days. Once agreed to and approved by the Regional Manager, the VR counselor must send the individual the

“Time Extension to Determine Eligibility” which is found in AWARE. That letter has been revised such that there will no longer be a requirement that the individual sign and return the letter to DBVI. The new letter will note that the VR counselor and the individual have “mutually agreed” to the extension. Language in the policy manual has also been revised, noting that the extension “was discussed with and agreed to by the individual”. All other policy and procedure regarding the extension of eligibility determination has not changed.

Chapter 5: Individualized Plan for Employment (IPE) Development

1. Policy has been added to the VR Policy Manual establishing criteria for the VR counselor to determine when a Criminal Background Check (CBC) may be purchased. Criteria would include when the individual self-reports a history of criminal offenses, if the vocational goal could be impacted by a criminal history, and/or if the VR counselor receives other information regarding the individual identifying any criminal history.
2. The CBC policy also identifies when it would be appropriate to pursue a CBC (or to share the information received from a CBC) as part of a referral to VRCBVI.

Chapter 6: Individualized Plan for Employment (IPE) Services and Implementation

1. **Documentation of Actual Services for individuals in service status:**
Additional language has been added to provide clarification as to documentation requirements by the VR counselor for an individual in service status. Additionally, new language has been added regarding documentation of Actual Services for individuals who are in a Service status. The VR counselor is responsible for documenting within Actual Services in AWARE notes summarizing the IPE services that were actually provided. Every service on the individual’s IPE that was provided during each quarter of the year must be documented. An Actual Services summary note must be included on a quarterly basis at a minimum, but the VR counselor may include summary documentation more frequently during the quarter as appropriate. Services on the IPE that are not provided during any given quarter are not to be documented in Actual Services. However, the VR counselor must include at least one (1) Guidance and Counseling Services (G & C) note per quarter in Actual Services.
2. **Documentation of Measureable Skill Gains (MSG) and Credential Attainment:** The VR counselor is required to document in AWARE Measureable Skill Gains (MSG) and Credential Attainment as they occur for the individuals they are serving. Additional language has been added to provide clarification as to documentation requirements by the VR counselor for Measureable Skill Gains and Credential Attainment.

Measureable Skill Gains must be reported for individuals who are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving documented academic, technical, occupational, or other forms of progress, towards such a credential or employment. The VR counselor must include any education and/or training programs that lead to a recognized secondary or post-secondary credential or employment on the individual's IPE. Documentation could include a copy of an enrollment record, vendor training reports, electronic records, attendance records, transcripts or report cards, employer reports noting the results of a knowledge-based exam or certification or reports demonstrating progress in attaining technical or occupational skills, case notes documenting communication with the school or training vendor.

Credential Attainment must be reported for those individuals who are enrolled in an education or training program (excluding those in OJT and customized training) who attained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the VR program. The VR counselor must ensure that the education or training program the individual is participating in results in a recognized postsecondary or secondary credential and can be documented and included in the Credential Attainment indicator.

Examples of credentials that would be considered credential attainment are cosmetology/barber licenses, CNA licenses, CPA's, Business Enterprise Programs (BEP), registered apprenticeships occupational certificates, job corps certificates, Microsoft Certified IT professional certificate, Automotive Service Excellence (ASE), Adult Education completion, or passing an examination for a state recognized High School equivalency.

Examples of credentials that would not be considered credential attainment would be basic skills certificates, first aid or CPR certificates of completion, ServSafe food handlers certification, completion of On-The-Job training, general computer/security training, good safety practices or hygiene certificates, workforce readiness certificates (such as for completion of a resume or job-seeking skills class), or graduation or certificates from a VR comprehensive rehabilitation center.

Credential attainment source documentation could include, but is not limited to:

1. Copies of the certificate, licensure, diploma, or other similar evidence that the credential was attained;
2. Results of an examination or other testing processes which as a result provide the individual with the credential;
3. Other documentation that would provide support and evidence that the credential was attained.

Chapter 8: College and Other Post-Secondary Training

1. **Trial Semester or Course:** New policy noting that sponsorship of tuition and fees as a trial semester (maximum of 6 credits) shall be exempt from cost participation by the student.
2. **Developmental Courses:** New policy noting that college developmental or non-credit courses which are required to be taken prior to admission to college (typically a community college requirement) shall be exempt from cost-participation.
3. **Summer School Policy:** Additional policies regarding sponsorship of summer school have been added to the VR policy manual. The new policies include:
 - a. Defining summer school sessions as the final semester of the school's academic year.
 - b. Application of cost of participation policy defined for educational expenses related to summer school (Expected Family Contribution). If the EFC has been applied fully for the Fall and Spring semesters (100% of EFC applied), no further cost participation will be applied. If the EFC has not been applied fully, 25% of the EFC will be applied towards cost participation for summer sessions.
 - c. Policy clarification of housing sponsorship for summer school. Housing costs will not be sponsored for students attending a school within their community of residence unless justified and approved by the Regional Manager. Students who live off-campus because on-campus housing is not available will be sponsored at the community rate, with payments starting at the beginning of the month the summer session starts and through the remainder of the month that the summer session ends. Students who choose to live off-campus for the summer, where summer housing through the school is available, will be sponsored at the school COA for summer housing.
4. **Professional school sponsorship – approval requirements:** Reference to the DARS Higher Education Coordinator for guidance and information regarding students attending professional schools has been deleted. New policy requires Regional Manager approval prior to VR counselor sponsorship and approval by the Director of Vocational Rehabilitation and Workforce Services. Professional schools generally include law school, schools of medicine, dentistry, and pharmacy.

Chapter 9: Supported Employment and Customized Employment

- 1. Employment Start and Stability (Employed Status):** New policy and procedure has been added describing when and under what circumstances an individual must be placed in employed status under a supported employment program. The VR counselor must enter the employment start date when the individual begins employment, but must leave the stability date (Stable Date) blank until stability is achieved. This will place the individual in “Service-E”. When employment stability is achieved, the VR counselor will note the “Stable Date” in the Employment data page, which will place the individual in Employed Status. Funding will shift from time limited services (provided by the VR counselor) to the extended services phase (funding provided either through DBVI state funds or other funding sources).

Chapter 10.2: Paid and Unpaid Work Experience Training

- 1. Work Experience Employment Sites:** New language has been added to the chapter to provide greater guidance to VR staff regarding criteria for establishing and working with a work experience employment site. New policy has also been added in the situation where DBVI provides the employment setting for the work experience. The additional policy establishes criteria to ensure appropriate ethical boundaries are established and maintained during the work experience.

Chapter 11.4: Maintenance

- 1. Gift and Fuel Cards:** New policy and procedure added regarding use of “gift or fuel cards” when purchased to support or augment a substantial VR service. Gift cards (pre-paid or funded debit cards) may be used for maintenance purposes. The cards may not be purchased as a stand-alone service, and will only be purchased in circumstances where there is a recurring or ongoing need to provide a maintenance service and/or where the service need is best met by the purchase of a gift card. Cards may not be purchased for more than one month, but may be purchased for multiple months as needed. The VR counselor must ensure the Gas Card/Gift Card in AWARE is completed and signed as required by the individual receiving the card.

Chapter 12: Transition and Pre-Employment Transition Services

- 1. Documentation of Actual Services for individuals receiving Pre-ETS:** New policy added regarding required documentation of Actual Services in AWARE for individuals receiving pre-employment transition services. Per the new policies, the VR counselor will:

- a. Document the direct provision of Pre-ETS services in Actual Services in AWARE, including those Pre-ETS services provided to individuals who are being served as Potentially Eligible;
- b. Will provide at least one (1) required Pre-ETS service for any student with a disability who is being served as Potentially Eligible (PE);
- c. Will include at least one of the five required Pre-ETS services on the individual's IPE and will begin to provide one or more Pre-ETS services within the plan's time frame. Additional Pre-ETS services will only be added to the IPE when it's clear that the service(s) will actually be provided within the planned dates on the IPE (usually no more than 1 year).

Chapter 13: Job Ready and Employment Start

1. **Employment Start (Employed Status):** New policy and procedure clarifying how and when the VR counselor will place an individual in employed status. For individuals who are not receiving Supported Employment services, once the individual has begun their employment, the VR counselor shall note the "Employment Start" date in AWARE and will also note the "Stable Date". The Employment Start date and the Stable Date shall be the same date. This will place the individual into Employed Status in AWARE. Once an individual is Employed Status, the VR counselor must monitor the individual in the job for a minimum of 90 days in order to resolve any issues that may arise prior to closure.
2. **Supporting Documentation Requirements for Employment Start:** New policy describing required source documents to properly document employment start. Source documentation could include a pay stub or other written verification from the employer. If no appropriate supporting documentation is provided to the VR counselor, the counselor must justify in case notes why the source documents were not received.

Chapter 14: Case Closure

1. **Supporting Documentation requirements for Successful Case Closure (wage information):** New policy describing required source documents to properly document wage information for a successful case closure. Supporting documentation may include such things as unemployment insurance wage match, pay stubs, documentation from the employer (email, letter, etc.), or documented evidence of income earned from sales or commission. If no appropriate supporting documentation is provided to the VR counselor, the counselor must justify in case notes why the source documents were not received.

Glossary of Terms

1. **Additional Terms Added to VR Policy Manual “Glossary of Terms”:** A number of additional terms have been added to the policy manual’s Glossary of Terms. Several new terms referenced in the previously revised college policy chapter have been added with definitions. These include the Expected Family Contribution (EFC), Student Aid Report (SAR), Cost of Attendance (COA), Developmental Courses, Need-Based and Merit-Based Financial Aid, the Free Application for Federal Student Aid (FAFSA), Educational Expenses, and Disability Related Services. Additional terms and definitions added include Actual Services, Measureable Skill Gains, Credential Attainment, and Weekly Earnings at Employment.

Policy Approval Requirements (Appendix)

A new appendix has been added at the end of the VR policy manual providing VR staff with specific information regarding required approvals prior to sponsorship based on the service, cost, or both. The appendix will reference approval requirements found in each chapter of the policy manual, with links to the relevant section of the chapter.

Forms/AWARE Letters

1. The “Paid Work Experience Contract” has been revised. A sentence was added to section 3.B (DBVI’s Responsibilities) noting a responsibility of the VR staff is to “Ensure the trainee understands there is no obligation on the part of the employer at the work setting to hire the trainee”.
2. The AWARE “Time Extension to Determine Eligibility” has been revised. The sentence noting the individual must sign and return the letter has been deleted. New language has been added noting that the individual and the VR counselor have “mutually agreed” to the extension.