

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>I would like to see the definitions for job coaching versus job retention strengthened. I think some requests for job coaching are really retention related. The job developer should expect to do something for the retention payment. I get the feeling some of them think it is just a bonus and they are not required to do much of anything for the payment and/or are billing for coaching when the action is employer contact related rather than actual coaching.</p>	<p>Good feedback and we will work to strengthen that definition</p>	<p>Edits have been made to the definitions of retention & job coaching to help clarify the difference. Training will also be developed to teach VR staff & contractors the expectations of each of these services.</p>
<p>I was extremely disappointed to see that the job developer would change strategies on the “Job Placement Strategies” form if the client changes their employment goal without simply referring the client back to the VR counselor for re-evaluation of the appropriateness of the goal based on VR criteria. I would rather that the draft state that if the client changes their mind about their vocational goal at any point, the job developer would request a joint meeting to discuss approval for the new change. We make it very clear to VR participants that there are goals that VR counselors may not approve but they can apply for jobs on their own that VR isn’t supporting.</p>	<p>Thank you for the feedback, we agree and will clarify the definition.</p>	<p>Language added to Step 3: Job Placement Strategy to clarify that VRC & Participant must agree with any changes in the Vocational Goal.</p>
<p>I also want it to be clear that long-term supports and what it will take to be successful on the job is not the job developer’s responsibility but the VR counselor’s responsibility as a part of the plan. The job developer may be involved in helping set up long-term supports by participating in joint meetings but it should not be a part of the Job Placement Strategies report.</p>	<p>We agree and we will review the language to be clear.</p>	<p>Long term support removed from process document. It is the responsibility of the VRC, not the Job Placement provider.</p>
<p>I like that job coaches will write a training plan. I like the idea of professionals in each field to be coaches. They will need good training (several days) to become trainers: task analysis, step by step coaching, recognize client needs. How about hiring</p>	<p>Good suggestion, we are looking at using teachers and TA's in the summer time to work with youth.</p>	<p>This will be addressed in the MQ's.</p>

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>teachers or teaching assistants to coach? They are trained in teaching.</p>		
<p>In Step 3: Job Placement Strategies it states: If participant's vocational goal changes during the course of job development activities, the vendor will be responsible for updating the JP Strategy Report to reflect the goal change This suggests that it is an option for the vendor to change the job goal without VR approval; example would be a client finding a type of employment not discussed with counselor and the Job Developer choosing to assist in obtaining that position based on the clients wants.</p>	<p>Thank you we will clarify this</p>	<p>Added a line to clarify that VRC & participant must agree & approve the change.</p>
<p>In Step 4: Job Placement Strategy Review & Reports it states; Vendor will submit monthly reports after the first full month of job development and strategies due no later than the last day of the month My interpretation of this means that a March report is due no later than the last day of April which creates the option for delay, possibly unavoidable.</p>	<p>We will review this language and clarify where necessary.</p>	<p>Updated to standard contract language of 15th of following month</p>
<p>What about CRC as a qualifying criteria on this list: ?? MQ's for Supported/Customized JP</p>	<p>Thank you, we will consider adding this to the MQ's</p>	<p>This will be added to the MQ's</p>

Feedback	Response	Edits Made
<p>Community Based Work Assessment : not tied to a specific career goal - why not? We have worked hard as part of our transition project at the School for the Deaf to do thorough career exploration and then set up a work experience in the community hopefully based on the students expressed interests which then can also serve as experience in their field of preference for when we move on to job development down the road. It is used as well to boost the resume / application. Discovery – why not for clients who have had Discovery? From my understanding of what I have seen in the Discovery process so far.... They are more like person centered plans, but do not provide an extended opportunity for working in the community. This is a valuable tool for the IDD client in order to learn exactly what kinds of supports and the extent of the supports needed in order for the IDD client to be successful in community employment. This is a nice piece of “Comprehensive Assessment”.</p>	<p>A CBWA does not have to be tied to a specific career goal, however it certainly can be. The definition is not restrictive either way. VR is working very closely with the DD system to improve the process and effectiveness. It is expected that Discovery will improve over time and will provide the level of information gathered during the CBWA. However, there will be an exception process for cases where this is not the case and further assessment is warranted.</p>	<p>Changed language to read "are not expected to be tied to a specific vocational goal..."</p>
<p>Job Development Flow Chart: Step 3 – Job Placement Strategies..... In developing the job placement strategies report.... Vendor may conduct meetings with the participant to discuss strengths, resources, priorities, concerns, abilities, legal issues, transportation needs and interest related to IPE goal.... These should already have been determined by the VRC prior to the referral. This sounds a lot like career exploration after the IPE has been developed. If the participant’s vocational goal changes during the course of these activities..... (Again sounds like career exploration being done after an IPE has already been established – putting the cart before the horse).</p>	<p>Thank you for the input we will clarify this.</p>	<p>No edits made. VR will include this in training development to help clarify Career Exploration services and how they differ from Job Placement.</p>

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>Can you explain Career Exploration activitiesare there any limitations to how much can be spent?</p>	<p>This definition is still under construction.</p>	<p>No cost structure will be added to Career Exploration by October 1, 2015. However, VR will continue to explore this as a future option.</p>
<p>Re: TVA please clarify TVA last maximum 8 hrs. It was thought that client worked the maximum (no more that 20 per week) they thought they wanted to assess need of supports. They may want to only work 2 or 4 etc.</p>	<p>Definition generally expected to last 8 hours, but does not set a minimum or maximum.</p>	<p>Reviewed the definition and it reads "expected to last...". This leaves flexibility for more or less hours.</p>
<p>I noted in the coaching definition, there was the word "behavioral" It was not clear what that meant. I would be concerned that counselors would use this language to avoid paying for PVA. I think there needs to be a clearer distinction between coaching and PVA, and the behavioral component of coaching should be more clearly defined in order to avoid counselors attempting to get vendors to provide services at lower rates or in some cases for free.</p>	<p>Thank you we will work to clarify the definition. We agree this is a difficult area. We would appreciate your suggestions on clarifying language.</p>	<p>The definition of Job Coaching and PVA have been reviewed and some edits made to help improve clarity. PVA will continue to be looked at in future work groups beyond October 1, 2015.</p>
<p>I was unclear about career and vocational exploration rates. Is this still to be done hourly? Or are we going to package it in a flat rate? I have found vocational and career exploration to be significantly more beneficial to my work with clients than assessments, and think it is important to continue doing so. In many cases, with proper exploration I have been able to bypass assessments and get people into desired jobs much more quickly. If it were to be established as a flat rate fee, I feel that a rate of \$1000 would be sufficient in establishing multiple informational interviews/job shadows, as well as obtaining minimal labor market information.</p>	<p>Cost structure for career exploration will continue to be evaluated and has not be determined. We agree with your comments about the value of thorough career exploration.</p>	<p>Career exploration rates will not be included by October 1, 2015. However, VR will continue to research this option for the future.</p>
<p>Are Labor Market Surveys going to still be a service? I was unclear on this.</p>	<p>Yes. This is a service under career exploration.</p>	<p>Added labor market surveys to definition of career exploration.</p>

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>In working with populations who are much more independent and only have minimal needs for job development services, I feel that there should be a fee associated with self-placement. As I'm sure this has happened with other vendors, it has happened to me multiple times for working with high functioning populations. If I'm working with this client for 3-4 months, and while searching leads, and directing them towards positions it is unfair for vendors to provide that level of services for them to ultimately find a job on their own, and then receive no compensation for the months and hours we put in to working with them. It would seem appropriate to maybe have a discounted placement rate in providing work for clients like this.</p>	<p>Thank you for raising this topic. It is one we will continue to research & consider.</p>	<p>Added self- placement language to the model.</p>

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>This actually is from the supporting document titled "Job Placement Provider Minimum Qualifications" that is on the website. I have been providing job development services to developmentally disabled individuals on a regular basis for the past four years and I have a master's degree in Social Science. I am concerned because it looks like I would no longer qualify to provide supported or customized employment services. I have also been providing job coaching services for the past three years to developmentally disabled individuals and it looks like I would no longer qualify to provide such a service. I do see that in both cases, if I complete APSE or ACRE certifications I will qualify. But I have two concerns with that and one is the cost (I have to confess I don't yet know the cost, but imagine that it could be substantial). But, in all sincerity, my bigger concern is with the phenomenon of certification and training providers materializing when a field seems to be in some way ripe for the suggestion that this will effectively address its challenges and needs. A significant amount of time and a certain amount of money will be spent by each individual job developer who takes the training for certification. Likewise, DHS will spend time and money to be involved in the entire issue of provider training, whether it is as simple as promoting certification and reviewing compliance or as complicated as researching and possibly developing alternative trainings. Both parties - job developers and DHS - could much more effectively spend their time and money in coming together to develop proactive strategies for increasing the involvement and commitment of employers in the hiring of people with disabilities. Employment First focuses on what is expected of service providers from individual job developers to agencies such as</p>	<p>Very thoughtful input, we are continuing to define our MQ's in coordination with Employment first and the executive order 15-04</p>	<p>MQ's will be edited to ensure experience is recognized and align with core competency requirements.</p>

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
-----------------	-----------------	-------------------

Goodwill to government agencies. Understandably, no requirements could be placed on employers. It is up to service providers to nurture their involvement. Job developers do this on an individual basis every day, but it feels like the time has come for a more comprehensive approach in which all the service providers join together.

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>Job Coaching is an area where the state is expecting increased training, higher level of experience / education, and additional reports, but is not increasing the wage. In the definition of other services the job coach is required to write a Systematic Instruction Plan within the first two week of employment. What will be the payment for this extensive report? The list of job coaching services is accurate, but coaching for some of those services such as hygiene, time management, and others will need to occur outside of the workplace. It would not sit well with an employer for the job coach to be taking time from work productivity to coach on those skills. Job coaching needs to be paid outside of the job when appropriate. In addition, the rate needs to be \$75 per hour in order to cover the cost of providing highly qualified and trained staff.</p>	<p>We agree with your outside workplace JC comments and will include that in our definition.</p>	<p>Job Coaching definition has been reviewed and determined that it does cover tasks that may not occur on the job site itself, such as on-boarding activities, punctuality (getting to work on time), hygiene etc. The rate will not change at this time, but VR plans to track effects on budget of all fee increases to see if future rate change is possible in this category.</p>
<p>It is discussed that if the client’s vocational goal changes that the Job Developer will need to update the JP Strategy Report, but will the IPE change? There are numerous instances that this updating this report is mentioned but not the IPE. Is there still going to be an IPE?</p>	<p>A change in the vocational goal will need to be agreed upon by the VRC and client. If approved, then the Strategy report will need to be updated to reflect the change. We will review the language in the proposed drafts to ensure clarity on this. Yes, the IPE still exists and VRC's will manage them per VR policy as usual.</p>	<p>Step 3: Job Placement Strategies language has been clarified.</p>
<p>OJT: Is this arranged and facilitated through the Job Developer? If so, there is no payment associated with this and it is expected that the employer has agreed to hire. Why is this and can a job coach be used to train? Is the client paid for OJT only through the employer? If a job coach is needed, where is the funding for this support?</p>	<p>Yes an OJT can be arranged by a job developer when approved by the VRC. Placement would be paid after three days on the OJT and retention after 90 days of work following the completion of the OJT. Training on an OJT is provided by the employer and is compensated by the wage subsidy. Alternatively, OJT development can be paid for outside of the Job Development</p>	<p>OJT definition & fee structure was developed.</p>

Feedback	Response	Edits Made
<p>The definition as it stands now, involves more than getting to know the client and identifying strategies. It appears to identify an in-depth process of assessment of information that would be necessary to create an Individualized Plan for Employment; a step that precedes referral for job placement and selection of a vocational goal and track. The job shadows and work observations that are outlined are examples. If someone is already deemed ready for job placement, these kind of activities with observational information are not necessary. The service definition also identifies a process of getting to know the client and development of a job placement strategy that will be lead to employment. This is a nice step, but would be better aligned with the referral acceptance as it is part and parcel to it. Consider combining the two fees. The report locks us into a way of doing business that might not be necessary. It feels like micro-managing the way we do business. It is good to have a plan, but we want flexibility. The fee of \$250 for tract 1 and \$500 for tracts 2 & 3 are not sufficient to cover the additional activities that are requested in the service definition. 30 day Report: \$500 has been moved from retention to 1st 30 days, which is great, however it can still be rejected with no</p>	<p>process for a set fee to be developed. In this case the no milestone payments will be made.</p> <p>There seem to be some confusion around the definitions and your interpretation. We will review and clarify as much as possible.</p>	<p>No changes needed. VR will include this in training development to help clarify use of services. Working on a reporting structure that will be efficient and effective.</p>

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>payment We don't want to see 30 days on the job as an "assessment" of a client's readiness to work unless this is part of the definition. Concerned that the amount of activities that VR wants us to do as part of job strategies will be cumbersome to report on. Concerned that VRC's may refuse payment if they don't think we have done enough work or the client says we have not been in contact.</p>		
<p>Also, clear, objective guidelines for the decision point between tracks 2 and 3.</p>	<p>This has been a challenge and we are still working on it. We understand the need for clarity.</p>	<p>Track 3 definition has been edited.</p>
<p>The whole portfolio thing in place of the wording Job Prep is also a bit confusing since most of us associate portfolios with a certain notebook of paperwork and not all of our clients need a portfolio but need help with job prep services. Again, the more we change names and concepts the harder it will be for people and ORCA to get their heads around it and will take longer to implement. Let's try to change as little as possible. Asking a flat rate for job prep is good and easy</p>	<p>Thanks for your input. We'll work on that.</p>	<p>We will be providing training around these issues to provide clarity and help with the transition.</p>

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>enough to change in ORCA and easy enough to understand.</p>		
<p>Is there any flexibility with the Participant Portfolio fee? I feel like we may be overpaying for some services if the client is only needing an updated resume or only a couple hours of interview preparation. I think also that Job Developers may argue that every client will need this Portfolio when they may just benefit from a shorter interview prep or a few edits to a resume.</p>	<p>Thanks for your input. We'll work on that.</p>	<p>No changes at this time. VR will monitor the effectiveness of the Portfolio and the fee structure.</p>
<p>Please include in track 3 clients who have multiple barriers/disabilities (as opposed to only those clients who have one significant barrier). For example, clients who have severe an persistent mental illness with barriers such as no work history, significant criminal record, chronic homelessness, personality disorder, etc. require significantly more intensive services than those with only a severe mental illness who would like to return to the work force.</p>	<p>Thanks for your input. It is anticipated that MH clients presenting the most significant challenges to placement will be served in Track 3. Also, multiple disabilities will definitely be a factor in determining the track.</p>	<p>Track 3 definition has been edited.</p>
<p>Please allow for clients to move from track 2 to track 3 once additional barriers or limitations are discovered by the job development specialist</p>	<p>This is still being worked on. We will need to develop some guidance for moving between tracks.</p>	<p>Please see edits to Track 3.</p>

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>Many of the people we support have very specific job parameters. Some people are only able to work for very brief periods of the day and require customization to a level that often results in an employer offering only a few hours of work a week. If a person has identified that they want to work 20+hours a week, we are finding that we are only able to achieve this by combining 2 to 3 jobs. Although these jobs align with their Discovery themes, they do not necessarily fall under one common goal area. And the Job Developer is essentially developing, placing and retaining 3 jobs simultaneously for one person. I am not sure what to suggest to address this scenario.</p>	<p>Thanks for bringing up this scenario. We discussed it briefly, but likely should revisit it.</p>	<p>No edits made at this time. However, VR will do further review to evaluate rates of occurrence.</p>
<p>Job Prep – I have serious concerns about the limited one time \$200 fee for job prep. This seems to make the assumption that only some people need job prep. I disagree. This should not be something that is handed out on a limited basis. Everyone looking for a job benefits from job prep. And to make the assumption that those that do need job prep need it only one time, is shortsighted. I have found that people benefit greatly from ongoing job preparation. This may include monthly work on hygiene issues, interview skills, and resume changes. I have found that many people need to work for extended periods of time on interviewing skills to get that down. Many of the individuals I have worked with lose those skills quickly if they aren't working on them regularly. Even with a job carve, employers want to meet the prospective employee prior to the offer of hire, so that first impression needs to be the best it can be, and job prep helps individuals be successful with that. Job prep also helps people keep engaged in the process and helps keep their motivation up. Also, if the work for helping with submitting job applications is</p>	<p>We may need to take another look at the proposed fee.</p>	<p>No edits made at this time. VR will monitor the effectiveness of the Portfolio and the fee structure.</p>

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>now part of the outcome payment for job placement, not a separate job prep payment, that will increase the amount of work involved in job development without increasing the amount of the outcome payment for the job developer.</p>		
<p>Topics and questions not discussed at the April 14th, webinar and my comments. Currently our contracts do not allow us to sub-contract work. I do understand the need to be sure who is providing services to clients and ensure they meet the criteria required by the contract. I would like to suggest for the sake of a “client first” environment that approved OVRS contracts can subcontract each other’s services. Especially for the sole proprietors who may just need back up on vacation or have a solid lead for a client they are not working with. Allowing job developers to inform each other of upcoming interviews or an employer’s current job opening and help to staff it could help to increase the chance for the number of matches for all our clients. It might be nice to have some feedback on that option.</p>	<p>We do need to make sure that the individual providing the service meets the criminal background and qualifications standards. That being said, I like your idea of a system that allows cooperation between vendors, especially small ones. Contracts office may be able to help us out here.</p>	<p>VR will discuss subcontracting with the State Procurement office for options.</p>

Feedback	Response	Edits Made
<p>If you determine that OVRS will save money by taking the job prep in “in house” than I would like to suggest the following. The turnaround time is quick: I had one counselor who wanted to save money and told the mother she was supposed to be filling out the job applications for a DD client. Long story short I wasted time and burned up an employer resource by trying to follow the VR counselor’s request. Despite lots of instruction to the mother about the employers online assessment after I turned in the application mother did not help my client take the online assessment and she failed. I don’t think a job developer should be put in this situation. I also worked with a VR counselor tell me he would not pay for a DD client to fill out her applications because she had a master application and resume from a job readiness program. So again I wasted time waiting for his assistant to her fill out the applications. You might want to hire one person or resource that can not only get all the job prep done with a fast and accurate manner, but clients can stop by to access their help. When and if needed edits to a client’s resume requested by the job developer should take a priority. Same day service is what clients can currently get with job developers when needed for interviews and or other employer contacts. In the event a job developer is not getting the job prep they need done in a timely manner there should be a way to request that the job developer be paid to complete the job prep. This determination should also be something that provides the service to a client to ensure they are getting interviews and considered for jobs ASAP.</p>	<p>We will take your ideas into account as we refine the work.</p>	<p>No edits made at this time. VR will monitor the effectiveness of the Portfolio and the fee structure.</p>

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>People choose to receive services from VR when they want help to get a job, keep a job or find a better job. Overall this process reads as agency centered (agency has decision making power) rather than person centered (person has decision making power). Our comments are related to this observation. Participant should have the option to interview vendors to select a vendor before the referral form is sent. The participant should have the option to meet with the vendor before referral forms is sent. This could be changed to read "At the request of the participant, the vendor will meet with..." Do vendors get paid when they do not meet with a person?</p>	<p>We wholeheartedly agree that the participant needs to be better informed in the options of vendors and needs to be active in the decision process. I apologize if that did not come through in our language and we will make appropriate changes to make that clear. We are looking at bringing back the vendor report card showing their performance to give participants more information regarding this choice, as well as asking vendors to develop promotional material we can distribute to participants. Thanks for your comments.</p>	<p>VR will be preparing tools for VRC's to share with participants regarding vendor qualifications and data. Added "participant" to third bullet under referral process.</p>
<p>Is there flexibility with the tracts? For example, could a person move from one tract to another if necessary?</p>	<p>We do need to work on parameters around that possibility.</p>	<p>Please see edits to Track 3 definition.</p>
<p>How are we going to align this with the MHSE programs ?</p>		<p>This was examined by the AMH MH Medicaid specialist, Chad Scott, who indicated that this would be compatible with Medicaid billing and not a duplication of services.</p>
<p>I was wondering if the group has taken another look at the 5 day requirement to respond to the Job Referral? This just seems like it is going to cause a lot of issues and how can it be monitored when we don't know when the vendor actually received the referral? Idea: Change it to be 10 business days from the date on the Referral. We would know the actual date and can put on the form the date it is to be returned.</p>	<p>This is a good suggestion. We want to keep the process moving and this seems to be a place in some offices where things slow down.</p>	<p>This has been changed to 10 business days.</p>
<p>Another issue is that the VRC and client will be determining the track for placement at the very beginning. I do hope that there is some input with their current Service Coordinator as to what their current support needs are. Will they be doing any type of interview or will they just be using the ANAs to determine this track? How exactly is this</p>	<p>This has been a difficult process and we are still working out the details. Any specific suggestions are welcome.</p>	<p>The DD service coordinators will be active partners in determining the track. Please see edited track 3 definition for further clarification.</p>

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>determined as this will affect long term support needs?</p>		
<p>I see some conflict with the timeframe for the JP Strategy Report and if the Participant Portfolio is requested at referral. The Portfolio is due within 30 days, but the JP Strategy Report is due in 45. The JP Strategy meeting could be after this Portfolio deadline, so is there a possibility to extend or do this service later during job placement?</p>	<p>The timelines for both of these will be evaluated and we will provide clarity.</p>	<p>This language has been changed to reflect a more coordinated expectation and add some flexibility.</p>
<p>Concerned about the amount of time that it has taken to get an independent contractor approved. It is extremely hard to find qualified and interested Job Developers in Hood River and The Dalles.</p>	<p>The contract process takes time, yes. However, the new process will be streamlined from application to execution of the contract. VR has support from our State Procurement partners and we will be utilizing tools such as the internet to ensure documents and information are easily accessible.</p>	
<p>This looks very similar to the last contract that didn't go well, how is this contract going to have a different outcome?</p>	<p>Contract management plan is in development.</p>	
<p>There are not enough hours in the day and it seems like there is more work being put on counselors and nothing is being taken away. Now there are 90 days to plan, half the amount of time to do more work. b. There are constantly dysfunctions that cost counselors time. Counselors are having to hunt for money to issue/pay AFPs, there isn't communication regarding the status of the budget, people are worried and are wasting time and this is preventing counselors from providing services to clients in a timely manner</p>	<p>Thank you for your feedback. Yes, resources seem to be tight throughout the work we do. We are working hard to create a process that will alleviate some of the strain of time felt by staff.</p>	
<p>This does not address the underlying training</p>	<p>Training is still in development</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
needs.		
<p>Robert was stating that the downfall of the last contract was that there wasn't enough staff to monitor it. a. I think there were people monitoring it and throwing up red flags, the problem was that there was no way to make any changes. b. Will there be a way to make changes to this contract as issues arise? c. Also, what additional staff do we have now that will be monitoring the contract performance? d. What kind of monitoring will take place?</p>	<p>Contract management plan is in development.</p>	
<p>It would be ideal if vendors were only approved for services they are qualified to offer to reduce the amount of negotiations the counselor has to do with the job developer.</p>	<p>One of the goals of the new process is to help align qualified vendors with the appropriate services. Thank you for your comment.</p>	
<p>What training is being provided to job coaches? We heard someone say EOP, but that's not for job coaching.</p>	<p>Good idea. We are in communications with Employment First to coordinate training.</p>	
<p>I was unable to hear the webinar but am reading your documents sent out. I was disappointed to see that managers are being asked to review and agree to one out of three referral choices with all that they are already responsible for and the number of participants we have that need job placement services. My manager has ten counselors and I am worried about the amount of time it will consume. If this piece stays in the final draft, we will do it but I think it is unnecessary considering that VR counselors are already asked to make professional decisions based on given information.</p>	<p>Branch manager resources and input will be taken into consideration when developing a contract management plan. If used appropriately, Track 3 participation is expected to be very small.</p>	
<p>I was afraid in the paragraph about the strategy report being updated when a client changes their vocational goal because it is fine to have the joint meeting but I think updating the strategy report is less important than updating the Plan goal to reflect the change with a revision.</p>	<p>We agree, the job strategy report and plan should always be aligned.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>why would we change the name from Proposal to Strategies anyway, I like to say a “proposal of job placement and retention strategies in my authorizations and I think the fewer things we change in this new process, the easier it will be for people and ORCA to adapt.</p>	<p>Since we are changing the requirements of this step we wanted to change the name to draw attention to the new process. As well as, decrease the amount of cookie cutter proposals that currently occur.</p>	
<p>Sounds like you have talked to job developers already. Nothing new, but I get the impression job developers want a finished product, a commodity when we ask for their help with a client.</p>	<p>We appreciate your concern. Vendors have expressed the need for more detailed information up front to help them make effective job placement decisions.</p>	
<p>The rehab process is evolutionary and things flow one into another clumsily. Assessment is not complete when the plan starts or when a job developer is hired. The client’s ability and motivation to be active in the job search process changes with each challenge they face, including considering a job opportunity or dealing with fear. We need career exploration in the plan services to continue to find out and adjust to new information and ideas. Job search assistance is a category I would like to have the ability to authorize for special situations. I like the idea of job prep fee, but resumes and letters need to be created all along the job search process and I want the ability to work with the JD and client to get extra services that are custom made for the situation at hand.</p>	<p>We are working to provide structure while allowing for flexibility.</p> <p>We are working to provide structure while allowing for flexibility. The Portfolio fee is meant to compensate Job Developers for this time, but subsequent job prep will be part of JP milestone payments.</p>	
<p>On the JPFlowChart: It lists current cost & proposed New in the bottom left corner – the current cost there does not reflect current cost of Job Prep.</p>	<p>We were only comparing the base cost of the milestone payments. Job Prep does not have a set fee to report at this time.</p>	
<p>In the Webinar Robert referred to Track 1 being the same as current but Retention is listed as 1250.00 and the current is 1500.00</p>	<p>Money was moved up front to compensate vendors for their time earlier in the process.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>Robert also referred to Track 2 being basically the same pre placement; current cost for all clients in plan with a job developer excluding job prep is 300.00, proposed cost for all clients in plan with a job developer is 1100.00</p>	<p>Money was added and moved around the pay points in the new process.</p>	
<p>It is unclear if some of the optional meetings are included in the base fee or if the Job Developers can bill VR for the meeting; example: meeting after 120 days in Job Strategies Review and Report.</p>	<p>All meetings are included in milestone payments.</p>	
<p>In the DHS Vocational Rehabilitation Proposed Job Placement (JP) Process in step 2 there is no reference to ROI</p>	<p>We will take a look at this. Thank you for bringing it up.</p>	
<p>Step 4 also states: Vendor will use standardized form provided by VR.</p>		
<p>Is this the same form we are currently using or is that going to be different?</p>	<p>Forms will be edited and developed to match the new JP process.</p>	
<p>Step 4 also states Vendor must submit invoice along with first monthly report. Do we pay delayed billing ?</p>	<p>Not sure we understand the question. If the report and invoice are delivered together then they need to be accepted and paid within 30 days of receipt.</p>	
<p>The question was asked yesterday if Background checks would be required for Job Developers which seemed to be required for independent Job Developers but I was unclear about how that would affect corporations such as Goodwill and St. Vincent DePaul who may or may not require background checks as part of their hiring practices for their employees.</p>	<p>VR will require background checks from all contracted vendors.</p>	
<p>A lot of new terminology exists in the changes such as Job Placement Strategies and a question came to mind if there were steps being taken to coordinate the initiation of the new contract with changes in ORCA where the wording in the contract would match the wording in ORCA.</p>	<p>Yes, this is part of the project plan and will be addressed.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>There is a concern that if we decide to pay a fee for placement before plan from and TWE or OJT, we may not be able to have the AFP written prior to or the same day of the service.</p>	<p>AFP process is being examined to reflect field realities.</p>	
<p>What happens if a client is placed before one month of job development? Do they still get the \$500 associated with that month report/invoice and placement?</p>	<p>Yes</p>	
<p>Job developers and coaches need to be fairly compensated for their time. This would include travel time, which in rural areas is crucial. The proposed limit of over 70 miles before any reimbursement is, in my opinion, inadequate. <u>I would suggest anything over 10, or maybe 20, miles be reimbursable.</u> Otherwise, job developers will not be willing to work in rural areas where they are crucial to our success, but will choose for cost effectiveness to concentrate on the clients who live close so they don't incur travel expenses that don't get compensated for. When I worked for WCD they paid us mileage, as well as 50% of our hourly rate for time spent traveling, and I think this would be a fair practice for us as well. Let me know if you have any questions. I know I speak for every counselor in my branch office, because we discussed it this week in our staff meeting. Also job developers also suggest they need some compensation if I want them to come 45 minutes from Bend to LaPine to help someone in a very difficult labor market. Thanks for your consideration of this recommendation. We are trying to build capacity so we need to make sure we properly fund the essential support our subcontractors provide us.</p>	<p>We are currently drafting a rural transportation compensation plan. Your input is very helpful. Thank you.</p>	

Feedback	Response	Edits Made
<p>I rarely or never have Standard placements. If a client needs JD help, they need customized help. And I really think more flexibility with service categories and pay schedule is needed. I would like all JDs to use the same rate for hourly services. It's a hassle keeping track of each JD's rate. If we are going to go with cookie cutter contracts, which I abhor, a service for the JD to spend time developing a relationship with the client and identifying the special needs must be acknowledged with an authorization for the service. I appreciate Lorene's feedback. I don't want to get negative, but I am getting worked up thinking about how VR treats counselors.</p>	<p>We appreciate your comments. At this time VR has chosen Performance Based Contracting for the JP process and are considering set fee structures for CBWA, TVA, Career Exploration, OJT set up, and job coaching to improve standardization around the state for these services.</p>	
<p>Written on site monitoring plan – good idea / but should be flexible as needs arise that are not addressed in the plan.</p>	<p>Good suggestion, thank you</p>	
<p>Limits of CBWA (no longer than 4 weeks / maximum of 1). Often in the case of youth or the IDD client, a work experience can turn into a longer term volunteer work experience (like hopefully for the rest of the school year) which again is a good thing. Continued practice and learning experience in soft skills for employment as well as experience for the resume. I have had clients in need of multiple opportunities for work experience to gain skills... and further test their interests (the Deaf or IDD client with limited life experience who is unable to tell us what they like and what they do not like – may require a couple of experiences). What if the initial work experience is not a good fit (say an environmental factor in a client with severe autism sensory issues) . Is it not a good thing to give them an additional experience in a different setting? – especially if it is someone who needs a week or two to finally feel comfortable in and understand the assigned duties of a job before they can show us</p>	<p>The examples provided sound like they are training services and not the CBWA or TVA assessment services. Training is in development to help address the difference in VR service categories. The Autism example is a great example of when the exception process for further CBWA/TVA assessments would be needed.</p>	

Feedback	Response	Edits Made
their true skills?	<p>Targeted Vocational Assessment(TVA) – completed in relation to a specific vocational goal. Can be provided to participants who have completed Discovery.... Good ... what about those who are not IDD and can benefit from this? 2. 8 hours max / up to 3 different TVA's/ - I like this as a piece of or immediately after career exploration to assisting in determining the IPE goal. – To further refine the IPE goal..</p>	TVA services are not limited to specific populations.
<p>Let's not make it so Black and White that we Lose the Ability to serve the Unique Needs of the client. There are those VRC's who are really black and white and unable to think outside of the box. They are the ones that will be unable to look at the occasional exception and work the structure in the best interest of the client for what they need.</p>	Thank you for your comment.	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p><i>Educational Expectations / Increased Educational Expectations</i> – just wanting to make sure that we do not discourage people who have the right combination of people and employment skills though perhaps do not have the credentials as we always have fewer job developers than our high demand requires. Many of our persons with Bachelors Degrees or Masters degrees tend to use job development as a stepping stone to other employment opportunities. If we require a Masters degree then the pay should be commiserate if we hope to maintain them as a vendor. Otherwise they will move on when the time is right.</p>	<p>Our definitions and MQ's allow for this.</p>	
<p>My concern is about Track 3. It would be nice if placing a client in Track 3 had to go through a brief approval process in Admin. so there would be consistency throughout the state. VRCs can get pressure to get job developers as much money as they can for a difficult placement. If a job developer is working with multiple VR offices, then if one office approved a Track 3, there would be pressure on the next office to do the same.</p>	<p>This idea has been considered. Thank you for bringing it up and offering support to this idea.</p>	
<p>1) So what happens at the end of 120 days? Are we giving the JD's another \$500? Does the whole thing start over?</p>	<p>No, this is a onetime milestone payment.</p>	
<p>What happens with a 2nd placement if a client loses the job? Is JD paid again as they are now?</p>	<p>Yes, but there is a 30 day on the job requirement instead of 3 days.</p>	
<p>What are the job coaching rates?</p>	<p>The proposed rates remain at \$40/hour</p>	
<p>Will ORCA be updated with these services?</p>	<p>Yes, this is part of the project plan and will be addressed.</p>	
<p>What about the vendors that hire clients within the larger organization when the job developer does not have hiring authority, like Goodwill. Each store hires as a separate entity. Could there be a modified payment system or one time payment</p>	<p>This was considered and it was determined that we would not be paying for this.</p>	
<p>With TVA...if placement is offered...does vendor get</p>	<p>A Direct Placement process has been</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
flat fee and placement fee??	developed for this.	
Is job coaching going to be included in the job placement contract?	We do not know exactly what the legal contract document will look like at this point. The Procurement tool is still under development.	
Can we address the issue of the client being placed out of a CBWA (not in plan yet) and paying a placement fee when we know long-term supports are not yet established and the client is actually not ready to be put into plan yet?	We developed a direct placement process and it is up to the VRC to determine if the placement is appropriate. In cases where the placement is appropriate we expect the vendor to complete the assessment with recommendations and a plan to implement them to insure success.	
A suggestion for job coaching would be to have 2 separate payment levels. Some clients need more intensive job coaching with special skills.	We have heard several suggestions about this. We have concerns about the financial impact and credentialing difficulties of having a two tiered JC system. We will keep this on our radar as we look at amending this contract in the future.	
What about TVA's in contract?	Not sure how this will look yet. The procurement tool is still under development.	
In a TVA because JD developed site. If there is a job offer does vendor get placement fee after plan has been developed	A Direct Placement process has been developed for this.	
Do VRC's have authority to reject job strategy report and refuse payment?	Yes	
After the Job Strategy Review, and we determine that a new Job Strategy report is needed, will we be paying for another report?	No, there are no additional fees beyond the milestone payments listed in the proposed process.	
Question about Personal and Vocational Adjustment Training: There are times when a client has been placed in a job and they start having behavior issues that would warrant hiring a behavioral specialist. I think we would want to have an exception here.	PVA can be provided anytime during Plan or PES.	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
Will we get more training when the new services contract becomes closer to implementation?	Yes, training is in development	
On all reports are there going to be specific expectations required?	Forms will be developed to match the new process.	
Are job coaches going to need some type of certification?	Per executive order and resulting OAR JC will have to demonstrate core competencies.	
Can PVA be provided by someone who is not a contracted Job Developer (skills trainer, counselor, etc)?	Yes and this is preferred in most cases	
Observation: Job proposal and Job strategy seem to be just different vocabulary and more money. How are they different? Job proposals did not work in the past how is this going to be efficient?	Job strategy adds an element of having worked with the client and determining conditions for client success.	
Please keep the required forms to a minimum with few changes. Every time there is a form change, we have to change them in our system to match which can be cumbersome and time consuming.	One of the goals of this new process is statewide consistency, this includes the required forms. Forms developed for this process will not require any updating at the field level. System changes will be considered when editing/developing forms to match the new process.	
Specifically regarding VRC's providing Career Exploration: This modality takes time and attention to detail, not only to set up employer contacts, but scheduling, contacting home providers and/or parents, setting up transportation, etc. The current staff often report over-burdened case loads with not enough time to do their work. How can they perform added responsibilities without compromising the individuals they serve?	We recognize the burden on VRC's and it is expected that this work will be done by VRC's as time allows. Vendors can be hired to do this work when necessary.	
There is a suggestion to utilize free services for pre-planning. People with IDD and/or co-occurring disabilities very often require 1:1 support to ensure they are well informed and understand what they are doing, why they are doing it and what follow up	We will utilize free services only when appropriate.	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>needs to occur. There will still need to be a coach or developer (or VRC?) making sure all of this happens, so why not just complete it with the consumer?</p>		
<p>\$40.00 for Job Coaching. This rate is archaic. The proposal does not cover the cost of living (even at a 2% increase), or the cost of administrative and training that is not covered in this direct cost. The substantial increase in job coach qualifications is not reflected in pay.</p>	<p>Thank you for your comment, but we don't see the increase qualifications as substantial.</p>	
<p>Regarding qualifications and certifications: Identify the core competencies and ensure coaches meet this standard.</p>	<p>Our MQ's attempt to do this through standardized training</p>	
<p>Regarding Comm Based Work Assessment: Please consider add Discovery as an option; people are all different and require different assessments and observations to ensure a good match. There definitely needs to be more than one work experience to ensure a good match.</p>	<p>VR is working very closely with the DD system to improve the process and effectiveness of Discovery. It is expected that Discovery will improve over time and will provide the level of information gathered during the CBWA. However, there will be an exception process for cases where this is not the case and further assessment is warranted.</p>	
<p>Regarding Targeted Voc Assessments: Job Developers are currently penalized for repeat placements or jobs that are not successful. There needs to be an opportunity to communicate with the Consumer and the VRC and together decide what happened and if it was out of the JD's control, that the JD would be paid.</p>	<p>Placement fees are paid for first two placements. There should always be a discussion to analyze what went wrong.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>I have heard rumors, that PVA would only be provided by LPC's, as VR would not consider anyone else as being qualified to provide these services. I do not know if this is true, but do feel it should be addressed. According to the state of Oregon, in order for an individual to provide counseling services for a mental health institution they need to meet qualifications for a quality mental health professional (QMHP) which according to OAR 309-019-0125(8)</p>	<p>PVA should be provided by qualified individuals.</p>	
<p>I think it is important to move away from having clients do repeated assessments, and agree that they should only do 1-2 in their VR process. One concern I would have, is how much time should pass before a past assessment is no longer relevant? I feel that there should be a timeline associated with this. For example; I think it would be appropriate to do an assessment for a client, if their previous assessment was over 2 years old. It is likely that the assessment that they did, is no longer relevant, maybe it was in a different field, maybe they were not successful, etc. In addition, some of the assessment reports I've received have been very limited in information. One was handwritten on notebook paper, and lacked objective information.</p>	<p>Good comment. Should be determined on a case by case basis.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>I think that and assessment rate at a flat fee is a positive thing. It allows counselors to know what they are paying for. I have structured my assessments in a similar capacity as the proposed development contract. It was unclear of how much we would be paid, but my proposed fee's are: Tier 1:Includes site development, coaching, and a comprehensive report of customers strengths and needs, and up to 10 hours of onsite coaching. \$1200 Tier 2: Includes site development, coaching, and a comprehensive report of customers strengths and needs, and up to 15 hours of onsite coaching. \$1400 Tier 3: Includes site development, coaching, and a comprehensive report of customers strengths and needs, and up to 20 hours of onsite coaching. \$1600</p>	<p>CBWA \$1100 flat rate was developed from cost data analysis and represents an increase from the average. This cost is expected to include job coaching in the cases where it may be necessary.</p>	
<p>With vocational and career exploration, it was also stated that if a client was already in plan that any vocational/career exploration would not be paid for. Instead it would need to be used as part of the strategies listed in the job development strategy section. My concern is, counselors would not take appropriate steps in doing proper exploration, rush clients into plan, and then expect us vendors to provide this service essentially for free, at the very least a discounted rate.</p>	<p>Training to improve job readiness of clients is being developed.</p>	
<p>Someone had mentioned that the "more money upfront" was VR's way of giving us a raise. Why is coaching still at \$40 an hour then? I feel that to be consistent with this statement it would be appropriate to raise coaching rates, even if it were only to \$50 an hour. Understand we still do not get paid for driving, case management, and reporting</p>	<p>We appreciate your feedback. We anticipate with JC transferred to DD at job stabilization rather than at 90 days, you will be billing at the VR rate for a considerably shorter length of time.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>for these services. \$40 hourly, BARELY covers the costs of doing business when providing this service.</p>		
<p>What is the process for retention referrals only? Is it the same as the development referrals?</p>	<p>Direct placement process will address this with a system similar to the current system.</p>	
<p>The upfront money from the Job Placement Strategy Review and Reports is appreciated and will take away some of the financial burden on Job Developers. However, it will be easier to give feedback to this once we see the standardize report form.</p>	<p>Forms are currently in development and will be shared for comment when drafts are complete. Thank you for your feedback.</p>	
<p>On The Job Training is a good tool for job developers to entice employers to hire job candidates that need less on the job supports. Thank you for making it a placement after 3 working days; it encourages the use of this tool.</p>	<p>We agree. OJT's are an underutilized tool.</p>	
<p>The Targeted Vocational Assessment is another effective strategy to assist the job candidate, Employment Specialist and Employer in finding the right job match. The maximum 8 hours is too short for some persons with disabilities. They need more time to be shown what to do, and then more time to practice the skill to demonstrate increased proficiency. Many job candidates with I/DD are capable of doing a job, but need the accommodation of more time to learn a skill than the typical non disabled worker. It is also a time for the Employment Specialist to assess accommodations and possible adaptive devices to facilitate future job placements. In order to fully evaluate and provide input on the (TVA), we still need information about the reports and pay</p>	<p>There will be an exception process in place for TVA situations that may require more than 8 hours.</p>	

Feedback	Response	Edits Made
<p>structure.</p> <p>I realize that everyone is trying to improve the contract and I agree with most of what was discussed. I think the payment system you have outlined is fair and an improvement at least for first and second tier clients. My main concern is the reporting documents that were presented at the Washington County meeting require a number of actions and documentation thereof, that are uncalled for and will be both expensive, time consuming and in direct conflict with the assurances we were given when we made the change to a Performance Based Model. We were told that there would be much less paperwork, and that we were to spend the majority of our time contacting employers, cold calling, setting up needs assessments etc. Now we are being told to provide in even greater detail all our actions on the client's behalf, even those which do not result in placement, plus the means, methods and contacts made . This is even more documentation than we did when we were actually being paid for Job Development. I feel that this would be fine if we were employees rather than contractors. The IRS is very clear on the point that whoever takes the risk gets the control of the means and methods of accomplishing the results. .</p>	<p>The current Job Placement contract requires specific standardized forms to be used. Contractors do not have to accept new forms in their place unless the contract is amended to reflect a change. The current contract and form templates should be consistent statewide. New forms will be developed to match the needs of the new process and will be designed to provide accurate and necessary information in the most effective way possible.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>It is difficult to understand the reason why the Job Developer is coming into the picture so late in the job placement process. On your flow chart it seems that it may be possible that Job Developers could be called upon for some assessment in your section of "Referral to Community Resources." Is this true? Could a Job Developer be requested to do assessment?</p>	<p>Yes, Job Developers can be utilized for assessments. Over the years vendors have stated that clients are coming to them not ready for work. We are working to improve our process to better prepare clients to go to work pre referral to job placement.</p>	
<p>If the VRC will be doing all assessment, I see this as a major problem. The VRCs are already bogged down with high caseloads and have difficulty keeping up with current demands. If they are asked to take on this additional task, I am not sure how they will be able to accomplish this successfully. To be able to do adequate assessment they will have to set up the opportunity, observe off site and write up a report. I see the level of detail in the Referral Form to vary considerably between VRCs, which could impact the success of the Job Developer.</p>	<p>VRC provides comprehensive vocational assessment post eligibility. This has not changed. The CBWA will still be provided by vendors as it has been in the past.</p>	
<p>Once a client is referred to a Job Developer and they are working on their job placement strategies, it does not seem that there is adequate time to be able to do a Comprehensive Strategy Report. If there is not enough assessment or information provided to the Job Developer and they have to do some additional activities, can there be an extension? It states that there is no additional payment for such activities; but I believe there should be as that is truly a part of Career Exploration and there is a payment for that. Why is there this discrepancy? It should be assumed at this point if the VRC has done all this assessment that the client should be job ready. Also during this process I am unclear how all conditions for employment will be known? This is a critical piece for the Job Developer and this component isn't included currently until job placement. I believe</p>	<p>It is the hope that the information provided by the VRC and from Discovery, the time should be accurate.</p>	

Feedback	Response	Edits Made
<p>that the Job Placement Strategy Report should only include methods and strategies the Job Developer will utilize for job placement with employers and working with the client. The other components: transportation, long term support plan and conditions for employment would be included in a Job Placement Verification Form. As the support needs may be dependent on the actual job site.</p>		
<p>I have some concerns regarding second and subsequent placements. If the first job placement does not work out for some reason, then there will be more assessment that needs to occur before just placing them into another job that may or may not work. The Job Developer will need to meet with the individual, possibly do some more assessment or exploration and there is NO additional funding for this as proposed. I believe each placement is a placement and should be awarded the same payment, as it takes the same amount of work to create a new placement as it did the first one.</p> <p>Career Exploration: The current proposed amount of \$400 is too low and doesn't accurately reflect all time and costs associated with this service. I am unclear who arranges this and facilitates this as it mentions doing job shadows and informational interviews earlier in the process with VRC. Is this if more exploration is needed? Does this happen</p>	<p>We have carried this forward from the previous contract. Additional assessments can be approved on a case-by-case basis. A good evaluation of an unsuccessful placement is very important to the rehab process.</p> <p>Training is being developed to help define the services provided under this category.</p>	

Feedback	Response	Edits Made
<p>during Job Placement Strategy? If a job coach is needed, where is the funding for this support?</p>		
<p>CBWA: When can this service be used during Job Placement process and who facilitates and initiates this service? If a job coach is needed, where is the funding for this support? TVA: When can this service be used during Job Placement process and who facilitates and initiates this service? If a job coach is needed, where is the funding for this support? Can this be done at a non-profit? Trial Work Experience: When can this service be used during Job Placement process and who facilitates and initiates this service? If a job coach is needed, where is the funding for this support? Is this service only for Track 3 participants?</p>	<p>CBWA & TVA are completed before referral to job placement. The flat fee for CBWA & TVA covers job coaching. CBWA & TVA should not be confused with a working interview, the goal of which is a job offer and is compensated by outcome payments only, not billed separately.</p>	
<p>PVA: Where can this be done? When can this service be used during Job Placement process and who facilitates and initiates this service. If a job coach is needed, where is the funding for this support?</p>	<p>See definition. Job coaching is a separate service than PVA. Approved by VRC.</p>	
<p>I think all of your definitions for OJT, Career Exploration, CBWA, TVA, Trial Work Experience and PVA need to be expanded. These are all VERY similar and it is difficult to distinguish between them all.</p>	<p>Training is being developed to help clarify these services.</p>	
<p>I am very concerned about your qualifications for job coaches. What if we do not have a job coach with those qualifications, but they have been working in that role for a number of years? Will there be some targeted training for job coaches offered through VR to help vendors and job coaches meet these qualifications? If a Job</p>	<p>We suspect, anyone currently working in the field as a JC should be able to qualify. In the event a staff member who has been working for you does not qualify you may talk to VR about the possibility of an exception.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
Developer does not have a qualified job coach will they need to access another vendor's services?		
I have had several instances of having a company contact me wanting to hire a VR client. The suggestion from VR in Salem has been to send these requests to applicable branches, but I have never received a response from counselors. The system does not flex to be job driven rather than contract driven.	Unfortunately, we do not have a large enough client base to fill all job leads.	
Discovery, done well, can quickly lead to an ideal job placement. I predict that this will be a common occurrence as the provider field builds their capacity and skill around doing quality Discovery work. Ideally, a person would have a file open with VR while they are nearing the completion of Discovery. If placement occurs prior to the development of the IPE, what pieces of the new process would/could be bypassed? Referral, job placement strategy report etc..?	We have created a Direct Placement process for this.	

Feedback	Response	Edits Made
<p>In the current contract, we have been asked to submit names of staff who have completed EOP11 and submit their resumes and background information in order to have them approved to be a Job Developer for the agency. In our model of services, and in many models being developed around the state, Job Development is often a team approach. A person's support staff might make a connection and find a great placement while completing someone's Path services goals(volunteering, job shadowing, informational interviewing etc..) , a Discovery Specialist may create a connection that leads quickly to placement, one of our 850 staff may have a connection and facilitate a placement into a job... It can happen a variety of ways and through people that have not been EOP 11 certified. Often times, the VR counselor will make a subjective decision around whether or not the placement happened in a way that aligns with the EOP 11 model of placement. I would hope that in the new contract, placements would be honored as such regardless of the specific person who made the contact with the employer and " developed" the job. I agree that the person who would complete the VR documentation for the strategy report, placement/ monthly reporting for retention etc., should be someone who has been trained on the documentation for VR. This person would capture the work that is being done by the team of people supporting an individual through placement and retention.</p>	<p>Our requirement is that all job developers meet our standard qualifications.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>Forms: It would be great if we could give feedback on the forms before the final ones are released. The current ones are not user friendly, don't make sense in some settings, and use more paper than necessary. VRC's have repeatedly said that if it is not in ORCA with pre-filling contact options, they will not use additional referral forms. As mentioned earlier, this model requires that the referral form be filled out completely - something it seems counselors will not do.</p>	<p>The Forms work group will be presenting draft forms to VR staff and the vendor community at a later date. Feedback will be requested. The drafts are still in process. Your comment has been passed onto the Forms work group for consideration.</p>	
<p>Vendor statistics - will those be available to vendors before released to public? Any consideration to types of consumers worked with? For example - those providing youth transition services will have long placement times. This also comes back to whether or not consumers are job ready when they are referred - which hasn't been consistent. Also, it should look at the type of job found - long term position carved or just plugged into the next available position and the job retention rate of the individuals placed after the 90-day period ends.</p>	<p>This tool is still in development. Vendors will be involved in this development process.</p>	
<p>If jobs are found before the full process, what steps will be taken. Currently it varies between counselors and branches.</p>	<p>We have created a Direct Placement process for this.</p>	
<p>Standardization of assessment forms (CBWA, TVA, etc.). I request that person-centered language and cross-disability consideration be used on the form. For example, one CWE form that is currently used in some offices rates understandability of speech. This obviously doesn't fit for Deaf individuals. This is just one example. This would be a way for OVRs to model to employers how to use person-centered language and consider varying abilities and accommodations.</p>	<p>Good comment. Your comment has been passed onto the Forms work group for consideration.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>Job Coaching Rates: Encourage you to consider an increased amount for job coaches who are specifically trained to provide service to specific populations (Deaf, Autism Spectrum, I/DD, etc.). The vast difference in services between general job coaches who do not have education and background in the field and those who do is significant. Some charge the same for a quick 15 minute check in with the consumer as those of us who do detailed time studies, create individualized interventions, purchase assistive technology or create items for accommodations, etc. Often we are asked to job coach in Post Employment Services when a consumer is close to losing their job - sometimes even a week after the retention has happened - because the first job developer didn't do these things. I think a standard rate is a positive thing, but hopefully expectations will be a bit higher to ensure that the consumers are truly receiving effective services (I know that some consumers need more than others, but the point is the willingness of job coach to do what is needed). Since more money is paid to to use interpreters (spoken language or ASL) for general job developers to communicate with consumers in their native language, it seems it would be reasonable to compensate the vendors who employ job developers and job coaches who are fluent in these languages and cultures.</p>	<p>We appreciate your input. Hopefully our new reporting mechanisms and definitions will raise the quality of services rendered.</p>	
<p>Targeted Vocational Assessment: As stated earlier, consumers moving into a new field or youth with no experience need to have skills/experience to get a job. A very short term assessment won't provide this. Assuming that this is something that should be done pre-referral for job placement and that in that point in the process it could be longer?</p>	<p>It is important not to confuse TVA with other services, such as training.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>Note about payment for OJT - we were shocked to hear recently that other vendors were getting paid large amounts of money to set this up on top of the placement payment. We had always done the OJT negotiations (bringing info to VRC and then back to employer) for free</p>	<p>Our new system will help standardize processes and address inequities.</p>	
<p>It was stated during the webinar training that hopefully the job coach will be credentialed by both VR and DD Services. For some of us smaller vendors, we don't have the staff to commit to long-term services. Is there a standardized process for "hand-off"? There seems to still be a lot of confusion about this process for VR and DD services both. We have had VR counselors expecting us as the vendor to be the one contacting DD service case manager, setting up the person centered planning meeting, etc. This doesn't seem right.</p>	<p>We will address these issue as well as we can on the state wide level, but there will be a lot of work on the local level needed as well.</p>	
<p>Limitations of CBWA - does the limit of 1 at 16 hours total go for the consumer's whole VR experience, or just after they are in job placement services? If it is for the entire VR process - what is the proposed solution for individuals who have no work experience or no work experience in the field they want to get into if it is a field that there is not an official training program for? (Stocking, cashiering, landscaping, etc.) What about youth who have no experience and then determine what they thought they wanted isn't a good fit?</p>	<p>CBWA assessments are not intended to be training services. CBWA are assessment services and are not job placement services. Exposure to the job would include job shadows & informational interviews. Training would include services such as occupational skills & on the job training, as examples.</p>	
<p>New system is based on VRC's doing the process correctly, completing forms, getting the forms to vendor in timely manner. Only a few times in the last 5 years have VRC's provided the correct referral form with complete information. Now caseloads are even higher. It seems unlikely that they will do this consistently with higher caseloads.</p>	<p>Training and a contract management and accountability plan are in development.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>Career Exploration: Career exploration takes time and is an evolving process. It seems random to put a cap on the amount of cost that will be provided. Will Discovery take the place of career exploration? We don't believe these two services work hand-in-hand and we have seen the need for continued exploration as people are often indecisive. Max \$400 is too low of a rate. We will not be able to provide quality services with the proposed rate. We think that \$700-\$1,000 is appropriate for a client with a VERY CLEAR job goal. We think this is realistic, \$400 is not.</p>	<p>Discovery is intended to identify vocational themes, which is also the goal of career exploration.</p>	
<p>PVA: Will providers set their own rates? Will there be groups? What are the qualifications?</p>	<p>MQ's are under development. Rates will depend on qualifications and settings.</p>	
<p>OJT: Job Placement Professionals appreciate the move toward providing a hire fee for this service in line with regular job placement.</p>	<p>You are welcome.</p>	
<p>Trial Work Experience: Base level Trial Work Experience's without a lot of support will cost the provider at least \$1100. Suggest adding hourly job coaching fee for all support needs.</p>	<p>TWE is being evaluated based on WIOA changes. A coaching fee may be considered on a case-by-case basis.</p>	
<p>CBWA - Will not be provided for individuals who have completed Discovery. Discovery answers a lot of questions about someone's strengths, needs, preferences and vocational interests obtained through a variety of activities including job shadows and volunteer activities; but it does not preclude the need for an individual to participate in a longer work assessment to address employment readiness skills that can only be demonstrated through this experience. Best practice is showing that people with ID/D need more than one work experience to gain knowledge of the world of work and to make informed choice about work.</p>	<p>VR is working very closely with the DD system to improve the process and effectiveness. It is expected that Discovery will improve over time and will provide the level of information gathered during the CBWA. However, there will be an exception process for cases where this is not the case and further assessment is warranted.</p>	

Feedback	Response	Edits Made
<p>TVA: The process VR describes for establishing a TVA plan, developing a TVA site, monitoring and report are excellent. The length of time, maximum of 8 hours, is substantially too low to allow a consumer to learn the job and make a decision about the experience and for enough time for concerns to come forward. TVA's have traditionally and successfully been used to provide a bridge to hire for consumer's that have very limited work experience, skills and/or who cannot produce at a competitive wage. TVA reduces employer and consumer fears and offers an experience where both parties can make an informed choice about hiring. This service definition does not provide for this avenue to hire. Employers like TVA to hire. It offers a safe way for them to engage in job carving. Employers are our customer, too. The fee of \$300 that VR is setting for each TVA does not cover the cost of providing for each step of the process as outlined. In most cases people with IDD will need full-time support on their TVA, hour for hour, in addition to substantial work coordinating for transportation. A report and feedback session is also necessary. VR needs to work with vendors to understand the cost of providing this service. Average cost of TVA is \$2000 to \$3000 and often leads to an offer of employment.</p>	<p>There will be an exception process in place for TVA situations that may require more than 8 hours. TVA \$300 flat rate was developed from cost data analysis and represents an increase from the average.</p>	
<p>If someone does a CBWA and is determined not ready to move forward to job placement until they resolve a certain issue, a second CBWA is recommended to demonstrate the change in a work setting. This improves the chance of successful job placement.</p>	<p>There will be an exception process in place for extraneous circumstances.</p>	
<p>What are the forms that will be required and will they be based upon best practice guidelines. Base level CBA's without a lot of support will cost the provider at least \$1100. Suggest adding hourly job</p>	<p>Forms under development. \$1100 fee includes job coaching if necessary.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
coaching fee for all support needs.	CBWA: • VRCs have historically moved people into job placement who are found not job ready. This could be remedied by obtaining a job placement professionals expertise in plan development. Job developers possess expertise about actual jobs in the community and what is required. VRC's do not possess this same knowledge in most circumstances. The difference is inherent to the job duties of each professional. Having well rounded information will improve the probability of success. Gather specific information to help the VRC and client identify a goal that is achievable in the local labor market. The job developer is a bridge between VRCs book knowledge and the actual pulse of employers in the community	Early VRC engagement and additional staff training will result in better referrals. JD's specific knowledge will be utilized through engagement with CBWA, TVA & developing JP Strategy.
Referral AFPS – Many times, the VRC did not issue the Referral AFPs at referral. They were held until the AFP for Proposal was being issued, often months after the actually Referral mtg took place. With the new program, will the Referral AFP be given at Referral where they should be? That payment should be made if the Provider attended the Referral meeting,.	How the AFP will be used in the new JP process is still under review.	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>For all of us at Full Circle in Redmond Oregon, the changes for further rural support will not apply and further allow us to support surrounding rural cities such as Madras, Sisters and Prineville. The areas surrounding Redmond and Bend are a few miles closer in to the 70 mile max in order to have gas allowance for the use of our vehicles and time driving back and forth into these areas of needed support. Full Circle has not been able to provided needed services due to it not being cost effective for my employees delegated to these areas to travel effectively and be compensated for their valued time in gas reimbursement. Each case takes a tremendous amount of time and prompt assistance w/out much time for notice related to interview opportunity etc. Suggestion on our behalf is to compensate for our travel allowance in a 50 mile setting vs 70.</p>	<p>We are currently drafting a rural transportation compensation plan. Your input is very helpful. Thank you.</p>	
<p>As for the VR consolors determining a client is “job ready” I think there should be a side track in the event new barriers are exposed as the job developer works with the client. This could warrant allowing the job developer to go back into paid career exploration and working with the counselor to talk about the impact on the job goals before returning back to job development.</p>	<p>If a client is not job ready the vendor is encouraged to refer the client to the VRC who can determine appropriate next steps.</p>	
<p>No placement fee for a job after a Targeted work assessment. This seems contradictory to our shared goal of competitive employment. We, as job developers work VERY hard to create/set up these targeted work assessments. We advocate very hard for the employer to hire the client after the assessment is finished. If VR doesn't pay a placement, what incentive is it to get the client hired? Job developers would not advocate for a hire, and would rather have the client put into employment plan. Please reconsider this issue.</p>	<p>We have created a Direct Placement process for this.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>Assessments for Discovery. We believe that most of our clients who go through discovery will still need a work assessment. We are "discovering" that many of our clients are not motivated, reliable or dependable and will need more than just discovery to get a job. We take pride in our ability to place clients in the perfect jobs. Without an assessment, we cannot "sell" the client to the employer.</p>	<p>VR is working very closely with the DD system to improve the process and effectiveness. It is expected that Discovery will improve over time and will provide the level of information gathered during the CBWA. However, there will be an exception process for cases where this is not the case and further assessment is warranted.</p>	
<p>Vocational Exploration being taken away or having VRC's (they do not have not time to do this). This service is very valuable to our clients. We have developed many jobs through this process. Taking this service away would be a huge disservice to our clients and would limit the number of placements that we get each month. We have many success stories in the last few months, from clients who started with Vocational exploration and who are now working in competitive employment. VR counselors do not have time to do this service for their clients. Most VRC's have trouble managing their 80-100 client caseloads as it is.</p>	<p>Vocational exploration still exists and VRC's may hire vendors for this service as necessary. Payments for jobs coming out of VE are part of the Direct Placement process that is in development.</p>	
<p>My primary issue is with the idea that VRCs are going to be expected to do career exploration. I don't think that's realistic at all with the caseload sizes and workloads they currently have. Job developers are your experts on the ground and VRCs are not job developers. I'm afraid this practice will result in fewer placements which will negatively impact your budget in the long run anyway – although this is a cost cutting idea on the front end. VRCs have been asked in the past to perform job developer duties and it has never worked.</p>	<p>In some cases counselors currently do this. Some clients require very little assistance to do career exploration and VR staff provide that assistance. VRC will determine when to engage a vendor to provide this service.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>Job Placement- I am concerned that job developers be penalized for the need of repeat job placements. Sometimes clients quit jobs for reasons outside my control. Please consider a full placement fee if a second legitimate job is found.</p>	<p>We agree. A full placement fee is paid for a second placement after 30 days on the job. We hope that extra time with the VRC upfront and time with the placement vendor (see job strategy milestone) will result in understanding client needs better and result in fewer lost placements.</p>	
<p>CBWA- I have found that sometimes it is necessary to do a second CBWA to resolve issues, allow a client to try out another type of work if the first one is not successful, and for a client to improve their skills to move toward successful placement. Also, if an individual completes Discovery, it still does not always give them the work readiness skills that are gained through experience. A job shadow may not be enough for them to make an informed choice about work, like trying out a job for a longer period of time might do.</p>	<p>VR is working very closely with the DD system to improve the process and effectiveness. It is expected that Discovery will improve over time and will provide the level of information gathered during the CBWA. However, there will be an exception process for cases where this is not the case and further assessment is warranted.</p>	
<p>What if a TVA needs to be longer than 8 hours, for example has the potential with extra time/training to become a placement? Especially for customized I/DD folks, 8 hours is not enough time to determine ability to learn skills/tasks.</p>	<p>There will be an exception process for cases where further assessment is warranted.</p>	
<p>are community based work assessments, targeted vocational assessment forms goign to be standardized</p>	<p>We have a forms workgroup in place that will look at standardizing these forms.</p>	
<p>What is the VRC's process for referral? Specific forms stating which track the individual is? In the last 5 years we have only had 1 VRC actually complete the referral form with required information.</p>	<p>The Referral form will be a requirement of the new process. There will be training developed for VR staff & vendors around the expectations, as well as a contract management and accountability plan.</p>	
<p>We've heard that if a client completes a CBWE, VR will not pay a placement if client is hired by CBWE site after the assessment is completed, even if Vendor advocates for the placement and further</p>	<p>We have created a Direct Placement process for this.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
develops the employer relationship.		
Most of the clients referred to me are currently referred under standard employment, but now one of you had said that most of our clients fall under track 2 or supported? Has this definition changed? It seems to be the same or very similar as before.	No. We were attempting to explain that most clients who need supports will still fall into Track 2. Sorry for the confusion.	
Can Job Developers perform vocational exploration/assessment before an employment goal is chosen by the consumer. and the job development begins. Community assessments are done out of the office and the consumer should be observed	Yes, that is the best practice.	
What will the rate be for Job Coaching?	The proposed rate remains at \$40/hour	
In the Job strategy review and reports are you thinking a monthly email check in or is there something more involved and formal?	Standardized form that can be emailed or mailed.	
If a client is referred for job placement, and it isn't learned that they needed coaching until they were on the job (for whatever reason), how does the new contract address this?	The issue should be addressed with the VRC and coaching provided if needed.	
will the service provider requirements to be a vendor be changing?	Yes, these will be updated.	
If someone is able to obtain employment as a result of their Disvery process, will pieces of the new payment steps be bypassed.. ie, referral, strategy report etc ..	We have created a Direct Placement process for this.	
When do you anticipate having the payment structure figured out for the other services like OJT, CBWA, Career Exploration, Job Coachig etc.?	By the end of May	
Also interested in statistics, as to how well we are doing compared to other job developers	Thank you, we will look into developing a tool for this.	
I agree that people should only have 1-2 assessments. But what if the assessment was done was years ago, and isn't relvant to now?	This will be determined on a case by case basis & at VRC discretion.	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
Currently there is a lot of juggle work when someone enrolled in VR, but still completing Discovery, received a job offer through a Discovery activity. How can this be better handled so the vendor received a placement fee and begins retention?	We have created a Direct Placement process for this.	
are you considering tracks for services related to CBWA, Voc Ass, Job Coaching, PVA?	Not tracks, but we are considering set rates.	
You mentioned a Discovery service for some clients. When will Independent Contractors be able to provide Discovery Services?	This is a question for ODDS.	
Will EOPII still be required?	Yes	
will you be setting up a system to identify vendors with areas of specialty, i.e. TBI, Organization Training...so it is easier for VRC's to find the appropriate vendor match	That is a good idea. We will add it to the Tool creation piece of the project plan. Thank you.	
Getting AFP's prior to service is a CRITICAL problem. when should new vendor applications be submitted?	Training and a contract management and accountability plan are in development to help with this we do not have a date set at this time.	
We are happy to see that the participant is included in decision making about acceptance of the JP Strategy Report!	Thank you! We appreciate your partnership & participation.	
We like the idea that providers cannot hire people they serve in their own companies.	Thank you.	
What is PBC payments? • Is this job coaching NOT funded by ODDS? The last bullet describes a payment structure based on face-to-face time that is different from the current ODDS JC rate structure.	PBC means Performance Based Contracting and refers to the milestone payments for Job Placement services, which are based performance as opposed to an hourly rate.	
Trial work experience - this reads as an assessment to rule out employment Who determines "significant"? What is a "realistic" setting? How would you know someone will be successful unless you have the right accommodations, AT, etc. for a	Definition is out of current regulations and may change in the near future.	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>person? If someone requests services from VR, wouldn't VR assume that the person can work regardless of the significance of disability?</p>		
<p>I have been in a conference room listening but unable to connect to ask a question so I migrated to my desk to be able to submit this question - are there timelines in the process for between referral + proposal</p>	<p>We will put in a timeline and are working on the right length. We do want to allow enough time for the job developer to get to know the client and develop a strategy, but not so much time as to delay the process.</p>	
<p>I see there is an e-mail today that we are not taking any applications for new Job Placement Contracts/Developers past April 5th, is there an exception process to this if vendors in rural areas come forward?</p>	<p>Yes, we will review rural applications on a case by case basis & approve if appropriate for qualifications, time left on current contract and resources available. Standard contract time from application to execution is 90 days. There are 4 months left on the current contract so it may not be feasible to continue to award contracts after a certain point.</p>	
<p>Is there a plan for increasing the number of trainings for job developers and job coaches in rural areas?</p>	<p>Yes. We are separating the central office functions of providing the training and managing the contracts. It was too much work for one person. Separating the functions will allow for more training.</p>	
<p>What are you going to do to help VTC's provide the additional info to our vendors?</p>	<p>That is why we were so detailed in the flow chart leading up to referral to vendor. We are stressing that counselors need to spend more time with their clients pre-plan and pre-job developer referral to complete a Comprehensive Assessment. We are working at putting a separate page for the Comp Assess in ORCA, a working document for counselor to complete as</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
	<p>they work with the client to determine and document unique strengths, resources, priorities, etc.</p>	
<p>Standarized fees? such as for PVSA, CBWA, etc?</p> <p>when we initiate this contract are we rolling th existing ones into the new formula as well?</p>	<p>Yes for CBWA. What do you mean by PVSA?</p> <p>Transition from old to new contract is yet to be worked out. Stay tuned. Contracts office will help us with this.</p>	
<p>standarized fees for pva? cbwa? etc?</p> <p>Performance Based Contracting is payment for performance and outcomes. I understand that VR does not want to get into 'how to run your business' conversations with agencies and contractors, but there should probably be a cost /benefit analysis to ensure that VR gets what they are paying for, and that they are able to nurture and cultivate current vendors as well as recruit new vendors.</p>	<p>We are instituting a lot of standardized fees, but Personal and Vocational Adjustment is a bit trickier given the variety of formats that can be utilized.</p> <p>We did our best to come up with pay structure and amounts based on last 5 years of data</p>	
<p>Take the time to figure it out with the stakeholders/ partners. It often feels like there is a 'rush' to implement a new proposal, without taking the time to thoroughly review the impact.</p>	<p>Unfortunately there is somewhat of a rush given the time limit on our current contract. Please know that we have put significant time, effort, and thought into this proposal and we will continue to do so.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>The one other concern I have has to do with the fact that helping people with online applications will now be considered a routine part of job development. Right now, as always, my clients range from people who need help with every job application to people who don't need the slightest help with an application. I just want to honestly say I have some trouble with not getting some recompense for assisting those highest need clients.</p>	<p>We are trying to develop a system that provides fair compensation. We hope that with clients with the most severe challenges that direct employer engagement would be the primary mode of placement, with on-line applications only completed where there is already an employer relationship and a good chance of placement. Most clients in this category do not compete well via on-line applications as the first line of attack.</p>	
<p>As Employment Specialists we have dual customers, the VR client and the employer. This means that we need to partner with VR to present an employer with a job candidate who is motivated, reliable and dependable. Our relationship with an employer extends beyond the one placement; it is the possibility of more placements or warm referrals to other companies to open the door for more people to find and maintain competitive integrated employment, which is the ultimate measure of success. Therefore, the contract and services outside the job placement contract must allow and fairly compensate us to work with VR counselors to ensure a client is job ready, has a realistic and clear job goal, has access to employers based on their individual needs, is prepared for each employer contact and is supported after hire.</p>	<p>Sounds like you are proceeding with employers via exactly the right process. We have included the expanded flow chart prior to vendor referral to hopefully provide counselors to do the work with clients up front to ensure they are MRD. We do understand the imperative of building employer relationships.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>As was acknowledged in the webinar, we need to have the opportunity to have some time to meet with the client prior to job development. This is an important step and will facilitate making a quality job match between the job candidate and the employer. We have found that whenever we were not involved with the client prior to job development, it has made job development process take longer and in some cases end without success because the candidates job goal was inaccurate or not realistic, or they had barriers that were not identified prior to job development that prevented them from obtaining employment. When we fully know our job candidate, we are better able to customize employment that fits their skills and the employer's needs, and support both the employer and the new employee. We recommend this being completed prior to the referral if we have not completed Discovery with the client. It can be accomplished during Career Exploration and the information gleaned can be used to truly partner with the VR counselor in determining job readiness and developing a job goal.</p>	<p>The reason for the \$500 payment for the strategy report and for another \$500 in 30 days was to give providers time to get to know the client and their unique employment-related strengths and needs.</p>	

Feedback	Response	Edits Made
<p>The work performed in Career Exploration and additional information given at the time of the referral will aid us in writing the comprehensive and individualized Job Placement Strategies report outlining strategies and methods used to achieve successful Job Placement. The Job Placement Strategies step is not the time to be conducting field trips, job shadows and observing behaviors these services should be done prior to job development as they guide the client, VR counselor and job developer in identifying the best environmental fit, job goal, match between skills / interests and job, and supports needed during job development and on the job. The proposed form created by Washington County VR has some good information such as “2nd What is your strategy/focus for Job Placement that addresses the client’s barriers and introduces them to hiring employers, based on their functional limitations, interests, and strengths.” This demonstrates the importance of us knowing our client before we begin job development and supports the need for Employment Specialists to be part of the career exploration process. However, other aspects of the report seem to be in conflict with State and Federal Guidelines re: Independent Contractor vs Employer/Employee relationship.</p>	<p>Hopefully the counselor will uncover more information on the client prior to referral and pass that along to you. We have been hearing that the info vendors receive upon referral is often insufficient and we are working to reverse that. It is intended that with better info from the VRC upon referral in combination with the time spent with the client when developing the strategy will give the vendor the information and relationship they need.</p>	

Feedback	Response	Edits Made
<p>The contract is outcome based and as such according to the State of Oregon’s Worker’s Comp Division, with regard to the question “Can I hire an independent contractor and still maintain control?” “You cannot hire an independent contractor and treat them as an employee. If you do, then the individual is an employee. An independent contractor is free from direction and control. You may specify the expected results,” (which in this case is job placement)” but the manner and method of obtaining those results is not in your control if the person you hire is an independent contractor.”As a case in point, #1 Job Placement Strategy - Under contract and communications, is dictating how often we meet with clients and increases our reporting to the VR counselor from the current monthly report to a weekly/bi-monthly report. As a company, we have the policy of communicating weekly with our clients, but having to spend our time with detailed documentation to a VR counselor is not going to help us find a job for our client. It takes away from the limited number of hours we have in job development to find placement. If a VR counselor does not feel we are effectively doing our job, they do not need to give us another referral. We should not be burdened with additional paperwork that we are not being paid to complete and ultimately does not lead to better or more timely placements. Furthermore, the supports and tools the client should receive to present themselves to an employer is job prep not job development and does not belong in this report. We strongly suggest this form be revisited and changed.</p>	<p>I do not believe the proposed contract constitutes an employer-employee relationship. If you have a better idea than monthly reports to the VRC on the progress of job development, please let us know.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>Placements through temp agencies. What are the timelines for retention/follow along? How does someone's identified "stabilization" point conflict with VR rules around follow along .. or do they?</p> <p>How does VRC determine a client is ready? Nearly all of the referrals we get are not job ready. Some examples: consumer's need doesn't match job goal (need full time work, but have a job goal of retail and are only available during bus hours), they have no training or experience in their chosen field, they don't have basic soft skills, they don't have basic communication skills, they don't have any mode of communication for employers to contact them, they are not fluent in written English and struggle to understand even basic written communication, etc. Maybe it would help to have some kind of description or checklist be used so that "work ready" would have more of a consistent meaning between VRC's? Understandably, "job ready" would mean something different for youth transition students, individuals who experience I/DD's, etc. but some general expectations would be helpful.</p>	<p>Our practice has been to count temp jobs as regular employment after they have lasted 6 months. The first day after 6 months has been counted as the placement day. Stabilization would be counted as soon as it happens after that point.</p> <p>We did take into account reports that vendors were receiving referrals prior to discovering and addressing the client's individuals' needs in many cases. We have tried to address that with the expanded directions to counselors prior to referral to job developers. As you say, when a client can benefit from job development is an individual phenomenon. There was an instrument developed (Tool 1A?) just after the Staley settlement to guide counselors and brokerage staff. Maybe we need to look at that again.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>Observation: It has often been challenging to help VR counselors understand the local labor market and the requirements for positions. Often they move forward with a plan that as a job developer I know I cannot make successful without the consumer having more experience or more flexible transportation options, etc. This has worsened since the time for a plan has been cut to 90 days. Counselors have said, I had to get them in plan then we will deal with it - yet it is never addressed and the result is job developers trying to work with individuals who aren't job ready. I know this new contract aims to correct that - I'm wondering if additional training for counselors might be helpful? As the training offered for the last contract didn't seem effective - counselors were confused and overwhelmed so just didn't do the referral paperwork or the steps needed before the referral. There is a heavy emphasis on using Employment Department and other no-cost resources. This is great for those who can access these services. Many consumers struggle with this process - those who are Deaf and have limited English skills, individuals with social anxiety, individuals on the Autism Spectrum, individuals with TBI, individuals with significant mental illness, etc. Case loads for VRC's are high enough that we struggle to just get a needed AFP (waiting months at times). So it seems unlikely that they will have time to do this hands-on work. Can these individuals be referred to vendors for 1/1 support for career exploration, soft skill development, etc.?</p>	<p>We do need to expand training. We hear you on that. Thanks for the advice on more comprehensive training than was given last time. I also think that vendors need to be bolder with referring clients back to the VRC as needed if the referral was made prematurely.</p> <p>We made the emphasis heavy to get the point across to VRC's about what we have seen as an under-utilized resource with those clients who can take advantage of it. It is definitely not for every client and vendors can still be utilized for career exploration.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>The proposed rates shift some of the risk to VR as is appropriate. The proposed rates for track 1 and track 2 only increase the overall payout of a completed rehabilitation by \$300. This rate has not been increased in 4 years yet the cost of doing business and recruiting, training and maintain qualified employment specialists is going up. Also, the case management activities and reporting, as proposed, are more substantial. Job developers should NOT be penalized for the need of repeat job placements. Most failed jobs have to do with factors outside of the control of the job placement professional. Penalizing the job developer if the client loses the job is illogical and hurts the sustainability of a vendors business. Consider paying full placement fee if we deliver a job consistent with the goals outlined in the plan, but the client or their guardian turns it down Consider partial payment of Job Retention fee if after 45 days on the job, the client quits or loses job for reasons outside of our control.</p>	<p>While the increase in rate for track 1 and 2 is only \$300 per client, our conservative estimate shows rates increasing overall 18%. This is due to increased payments to vendors from \$300 to \$1100 even when there is no placement, along with the increase of \$1000 for track 3.</p>	

Feedback	Response	Edits Made
<p>20 job placement contractors discussed: • The cost of providing service has not been factored into establishment of rates which is a poor business model. The overhaul of services and restructuring with low rates and increased credentialing is expected to decrease capacity of vendors at a time when the state does not have enough service providers. As a financially responsible entities we cannot evaluate the changes VR is proposing without knowing all of the financial implications of the proposed contract. Providing input into a brand new system after it is drafted without input in the process does not promote partnership. It seems that VR does not look at job placement professionals as partners with expertise to help in the process. Job Placement professionals have not been included in the design of client services. This is a problem because we are the professionals who provide the direct service. We have perspective that could inform best practice and service delivery to increase client outcomes. We have been asked to vet an incomplete product. We want a 30 day comment period with an additional hearings process AFTER VR completes their final draft. We want a conflict resolution process written in the contract that protects the rights of job placement professionals. This has been left out of all previous contracts. Why is VR pushing through these changes in a hurried manner? Can the current contract be extended another year while this one gets the input it needs current contract for another year while this one</p>	<p>We have been made aware by some, but by all means not all, of the difficulty of staying in business using these contracts. This was also reported 5 years ago when contracts began, and yet we saw many vendors thrive and expand under the contract system. We do need to balance payments to job development vendors with other services our agency provides along with the available budget we have. If our payments to vendors (whether under an outcome based system or an hourly system) is insufficient to meet their business needs and yet so much as to drive VR into Order of Selection, VR may need to look at a whole different model of doing job development, such as providing the service in-house rather than through vendors.</p>	

Feedback	Response	Edits Made
gets worked out – we need to take a look at the impact		
Removing hourly job preparation. We work with ID/DD clients. Many of these clients require customized employment and require many hours of job preparation before they are ready to begin searching for a job. The fact that Job preparation is being taken away is very scary for small agencies like us. We place between 4-6 clients per month in competitive employment and Job preparation is our foundation. Creating a top notch resume can take hours. Many of these customized plans take 10-20 hours of Job prep before they are even ready for an	Job prep did appear to be abused in some counselors automatically putting in up to 8 hours per month (the same amount they would previously put in for hourly job development.) Do you have a proposed solution or a cap?	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
interview or a job carve. Please consider leaving this service as an hourly rate.		
I agree with many job developers who met yesterday and expressed that providing input to you about a brand new system after it is has already been drafted without our input does not promote partnership. Job Placement professionals have not been included in the design of client services. This is a problem because we are the professionals who provide direct service. We have perspective that could inform best practice and service delivery to increase client outcomes.	We did hear your dissatisfaction with the process.	
will there be job preparation money given to prepare job candidates for targeted interviews	No	
Is it only the VRC that determines if participant portfolio/job prep needed or can there be input by job developer? Can this happen at any time during the job development process?	I think that counselors would welcome your input	
If we are experienced as supported and customized job developers and have had training in customized employment through OELN or other training through the Oregon Seamless Transition Pilots, will this count as DHS approved training?	That should count as approved training.	
Will EOPII training have to be repeated?	No	
So I just completed EOPII training and paid \$200, will I have to pay this fee again?	No	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>My expectations of the job developer: Personal attention to each client with more hours per week than I currently see. I want to know in the “proposal” how the JD and client will find viable/quality job leads. The JD should look at the strong jobs, visit with employer, tour/observe the job and consider the client’s qualifications and needs such as training, coaching, accommodations. At that point, help the client visualize the job and see the virtues of both the job and the employer. This will get the client excited about the interview (and job) and energized to make it work. Then bring the client to the employer. The job developer would then negotiate the relationship and hiring with the employer, offer VR supports. Make sure accommodations happen and success: happy client and employer. I want weekly communications between the team of counselor, client and job developer and coach, and meetings- ultimate would be monthly. This means smaller caseloads for counselors and reasonable caseloads for JDs. Rehab Process: Application; job search prep (NCRC, Worksource). Eligibility. Vocational counseling, assessing client’s investment in employment outcome and their part in the process. Labor market research with help of job developer and client. Plan. Continuing adjustment to goals and actions. Training, job placement. Accountability of all parties.</p>	<p>AMEN! We just wish we had the ability to make the caseloads smaller!!!!</p>	

Feedback	Response	Edits Made
<p><i>Career Exploration opportunities set up by VR staff, OED WorkSource partners or other available no-cost options..... IN the absence of these, a vendor may be hired and paid...</i> Understandably this is made to be a hoop to jump through before paying a vendor. Certainly our more professionally skilled clients can go this route with no problem and probably already are. But, the majority of our clients are not that savvy and will require much in the way of hand holding. It is unrealistic to expect OED or other no-costs resources to be enough to accommodate the needs of such clients. Additionally with caseloads of over 100 (mine currently at 120 much of the time), it is not realistic to expect a VRC to do this with the bulk of their caseload. My schedule is currently booked out about 4 to 6 weeks in between appointments for clients given caseload size in general. This will result in back logs and delays in getting clients to plan and be especially problematic with the 90 days to plan.</p>	<p>We understand. There are places and counselors that do a lot of this work themselves and we wanted to call it out as an option. There is also a new WSO standard that says they will be doing more individualized services, so we want to encourage staff to use them more for clients who can benefit from their services.</p>	
<p><i>Participant Portfolio</i> – sounds like the old job prep activities. This is nice for clients who need this one time. What about the IDD or low English speaking, Deaf or otherwise language challenged client who needs help with filling out an application for each and every application that they submit and who need additional job prep for each interview they have the opportunity to go to. ? That’s where the job prep hours were a good thing.</p>	<p>There is a balance between what should be part of a placement fee and what is extra. Some places have not balanced that very well. We are attempting to add balance with this distinction.</p>	
<p>How many hours of additional work do you believe the VR Counselor will be required to do to read over the reports, check for errors, Read the portfolio, monthly reports and write all the additional AFP's for the services. As well as try to determine the right track for a client.</p>	<p>Hopefully not many. These are all things that are the responsibility of the counselor now.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
for ID/DD clients who it is determined need PVA can they be referred back to ODDS with an appropriate plan delay?	PVA can be provided by VR. If waiting for that service to be delivered delays service it is one we should move forward with providing service.	
With so many possible track 3 clients entering our system due sheltered workshops, will counselor's budgets and/or spending limits increase?	Budgets will be monitored through admin. When additional money is needed to increase placements and costs, the branch manager and field services manager will address the budget issue.	
How does the portfolio compare with the product we hope for from discovery or person centered planning? I anticipate overlap, do you??	It is our expectation that Discovery will help in this area. Since Discovery is an emerging practice it may take time for providers to reach this expectation.	
Is there going to be flexibility in the plan goals such as characteristics of a job rather than a specific type of job or career?	Unfortunately, it does not seem that the WIOA regulations allow for this beyond the student plans. However, there is no reason why the referral to Job placement provider cannot include those things and the plan be updated when a goal that meets those characteristics is found.	
The AFP language sheet we currently have has been helpful! Can you develop one for the new contract?	This is a great suggestion and one that we will work on.	
Please allow the stakeholders the opportunity to review and provide feedback after VR has completed the DRAFT final product. This draft should include the entire expenditures and fees, not just the proposed changes.	We have extended the timeline to allow for this.	
There can be less conflict and more intention and attention to consumers if the following were to be implemented; 1) a conflict/ resolution process, 2) give branch managers the authority to discipline their staff for unprofessional conduct, and 3) give vendors the opportunity to work with the VRC's as partners via presentations, mutual goal setting with	Within the bounds of reason we will take this in account.	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
consumers, etc.		
<p>Tract 1: If people get hired, then the JD should be paid. Tract 2: Allow TVA and/or working interviews. Tract 3: Consider hourly reimbursement. People who have very challenging or fragile medical or behavior concerns need more time and effort to ensure a good job match. The outcome payment does not incentivize current vendors to work with people who meet this criteria.</p>	<p>Your Track one and two comments are in alignment with the new process. VR is committed to our pay for performance model. If an agency does not feel they can place this population they are not required to work with them.</p>	
<p>It was stated in the presentation that Job Coaching would need to be listed on the referral form in order to receive it. I would be concerned that if for some reason it was learned that a client needed job coaching after they were employed, that VR would be limited in accommodating this. How would we work with counselors to get coaching? It seems that in all cases, that Job Coaching should be standardized for all referrals in any event that a coach needs to be on site.</p>	<p>If job coaching is identified as a need at any point in the process the counselor has the authority to authorize it.</p>	
<p>My only other question that I had while watching, was regarding extending retention dates. Did you catch that? It sounds like they would just leave the file open a little bit longer if we wanted to make sure someone was successful... but does that mean that the vendor does not get the retention at the 90 day milestone and we have to wait until the counselor closes the file?</p>	<p>This process has not changed under the new proposed contract</p>	

Feedback	Response	Edits Made
<p>The participant portfolio is beneficial in setting up initial materials to market the job candidate, but it does not address the need for job specific interview prep and applications which are appropriate for some clients who are in supported employment and can perform entry level jobs such as courtesy clerk. I understand your concerns with the over use of job prep. But rather than eliminate it completely, perhaps make it part of the initial job placement strategies agreement with the VR counselor as to whether or not job preparation services will be provided and paid outside of the contract based on client need. Cary Griffin, in his on-line training for Customized Employment, acknowledges that “customized employment is not the only way to assist a person with disabilities to find work. Traditional job hunting methods may work for some people.” In addition, best practices for learning a skill require repetition and relevant meaning. In preparing persons with I/DD for an interview they need repetition and relevant meaning for each interview. They will not be prepared just because they took a class weeks or even months prior. Employers need to see them as people with abilities not disabilities and job prep helps us to ensure they are able to put their best foot forward. Job development is not easy and the amount that we are compensated for placement is necessary to cover those hours; if there will not be any job preparation then the placement rate needs to be higher.</p>	<p>We are not encouraging skipping an interview process. We believe that training on general interview skills can be done as part of the portfolio payment and that prep for an individual interview is part of the job development process.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>With regards to compensation, the overall contract has increased by \$300, but so have the administrative costs due to more and more lengthy reports, and the elimination of job preparation services has actually resulted in us being paid less for our job development services. In addition, the expectations to be a certified Employment Specialist have increased and with that come the cost of recruiting and training of high quality staff. We have heard from many state leaders the necessity to increase capacity of qualified Employment Specialists to meet the demand, but in order to do that we must be compensated at a higher rate.</p>	<p>It is our hope that standardizing our reports will make them easier to complete and submit. We are in the process of taking our forms through a LEAN process with staff.</p>	
<p>In summary, there are many things that are moving in the right direction to provide quality services for job candidates and there are also things to be reconsidered and reworked. Perhaps it is in everyone's best interest to slow the process down and bring all the stake holders to the table to develop a contract that increases capacity, acknowledges the many and varied job development strategies that achieve job placement, attracts skilled, certified and highly qualified Employment Specialists, creates a true partnership with VR and ultimately serves our customers, the VR client and employers.</p>	<p>We are moving as quickly as our timelines allow. We have extended the contract through September to allow as much time as possible to vet these changes and solicit feedback.</p>	

Feedback	Response	Edits Made
<p>I think the current proposal form is adequate and provides a general description of the strategies and methods for first tier clients as well as most second tier clients. As for third tier clients, the new forms might be necessary as the strategies become much more complex. . As a result I believe that job development for all third tier clients should be provided on an hourly payment scale due to the difficulty involved. Under an hourly rate, I believe it's fair for you to tell us exactly how you want us to spend our time. I brought this up with Jennifer and after a long discussion she told me I could continue using the current proposal form, however I fear that VR still may plan to implement these new forms in September. I think this is a mistake and will result in much higher costs and much lower productivity for me. I have plenty of contact with VRC's and clients, as I'm sure most successful Job Developers do, a lot of it by phone and email. This is a time sensitive field and opportunity comes and goes quickly and can be quite unpredictable. Please don't burden us with these complex forms that will have no bearing on the success or failure of the placement. Also I think Job Coaches should be grandfathered in. After 20 years in this field I feel qualified to be a Job Coach even though my degree is in Psychology. I respect all of you and the work you do for our clients.</p>	<p>The new forms have not been completed at this point. Any feedback on current forms is appreciated. Under the current requirements you would be qualified as a job coach with the necessary certifications. VR is committed to our pay for performance model.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>What is expected of the consumers? We have consumers that don't communicate, go out of town for long periods of time, change their goal/conditions and then don't accept jobs we have lined up, who show up to interviews late, etc. We have developed a job seeker information sheet and agreement where we layout our expectations and our responsibilities and follow that. If the problem is a disability barrier we aim to address that and don't stop services until it is, but often times it is that the person is just not ready to be employed. At times VR counselors have been reluctant to stop job placement services for consumers even when they aren't job ready. Again, is there a standard expectation of what to do in this scenario?</p>	<p>When a vendor working with a client finds barriers to moving forward, the expectation is that this is communicated with the counselor. A vendor always has the right to say they cannot work with a client if they feel that they cannot help that client.</p>	
<p>There seems to be a large section of consumers who fall through the cracks. They don't qualify for DD Services, but their disability barriers are significant and they need long-term services to be successful. (Examples: youth, many Deaf consumers, individuals on the Autism Spectrum, etc.) The limits on portfolio payment and not paying for on going job preparation seems to be unfair for those vendors who frequently work with consumers who English is their second language, who have language or cognitive processing disorders, or anxiety that require a large amount of training and practice in order to interview. While it is possible to bypass the interview process in some positions, there are many positions where this is not possible. Many professional jobs do not allow this. It seems that not allowing for this extra time will lead job developers who may not be as ethical to not seek out jobs that the consumers may desire because of not being compensated for this work. For example, Deaf consumers who struggle with written English, but would be a good fit for a State</p>	<p>We are not encouraging skipping an interview process. We believe that training on general interview skills can be done as part of the portfolio payment and that prep for an individual interview is part of the job development process.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
job where you cannot easily bypass the interview process. Also, some job developers could shy away from taking on consumers who need this extensive support, leaving limited options for individuals who have I/DD and need more support.		
In the past when we have hired new staff it has been challenging to get EEOP training completed because it was cancelled last minute without warning. Also, not all vendors were notified when they were scheduled. If this could be communicated more clearly, in advance, and not changed last minute that would be helpful.	Good suggestions. We will work on this internal process!	
A flat rate of \$200 is a one-size fits all that is not consistent with the philosophy of rehabilitation. What is the rate based upon? Has this been vetted against the cost of providing the service?	The rate is based on an evaluation of the cost of job preparation services and a file review. That statewide data was used to figure the rate.	

Feedback	Response	Edits Made
<p>VR and client have already made the decision about vocational goal, number of hours desired to work and the tract for job placement . VRCs have historically referred people to job placement that are not truly job ready and whose goal is not realistic Consider including the job placement professional in the decision making process. If it is after the fact than the client and VRC may feel disgruntled by the job placement professional having a different opinion based upon their professional expertise. \$100 is too low to truly assess whether a job placement professional can take the case or not. Suggest combining the Referral and the Job Strategies Report into one process and one combined fee as the two activities combined will provide the information needed for the job placement professional to make an educated decision about the ability to succeed in job placement and to develop a good quality job placement strategy</p>	<p>Counselors are expected under this new model to be more engaged with clients, so our hope is that job readiness becomes less of an issue. Combining the fees puts too much money out for VR with a client being no closer to employment if the placement provider decides not to work with the client after the job strategies report. A goal is always negotiable as the process moves forward.</p>	
<p>Track 1: We are not getting paid for supporting clients through the process for clients who end up self-placing. We believe that everything we do builds upon their skills. It they get hired, we should get paid. – Maybe a 50% fee if the client gets a job from outside source. Track 2: The definition of competitive integrated employment is confusing. We think that people who can't produce at a competitive wage should be moved to tract 3 because employers don't need to accommodate for productivity and this is more complex job placement. Allow Targeted Vocational Assessment and/or Working Interviews as a methodology within Tract 2 to encourage employers to engage in job creation and working with people with IDD. Track 3: Performance based contracting is not a model that will encourage vendors to work with this level</p>	<p>VR is committed to its performance based contracting system and there is no indicator from our data that this refusal to serve the most significantly disabled clients is happening. While it may be difficult for some providers to serve this population, others thrive in this area. We are working on a direct placement model that will address the self-placement disincentive that currently exists.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>of client. This is because the outcome cannot be guaranteed as it is dependent on the labor market and requires a substantial amount of trial and error. Suggest hourly payment for these services.</p>	<p>The placement retention fee and JPS fees are also higher for this Tier.</p>	
<p>Track 3 Placement payment is \$2000 vs \$1500 for Track 2 – Placement for Track 3 participants can take over twice the work than Track 2, yet the proposed placement payment is only a 50% increase over Track 2, and I believe that may lead to Providers choosing not to accept many Track 3 participant referrals. It’s a good start, but is it enough to increase participation?</p> <p>The system has been built in a way that requires providers to access VR as a first resource for initial coaching. I would like to see an exception process for providers to not be required to access VR if a job has been obtained through a path service or Discovery prior to opening a VR file. A person who begins working as a result of a job placement outside of the VR process would have to quickly enter into the VR system and get through intake eligibility, plan etc.. In that period of time, if a person is considered to have met “stabilization” then there would be absolutely no point in accessing VR for initial coaching when long term coaching/ISE payments would be allowed to start.</p>	<p>This is an issue that needs to be discussed with ODDS.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
<p>My agency, Pacific Opportunities has one of the highest placement and retention rates in the state of Oregon. We work with hundreds of clients per year. Please consider small agencies like mine, as this new, proposed contract will not enable us to serve Oregon's most vulnerable populations and may cause small business like ours to go out of business. While serving on the job development advisory board for the last 6 years, I have not seen any changes from the feedback that we have provided and proposed. This is very frustrating. I hope that VR will listen to this valuable feedback from Providers, Agencies and Independent contractors. We all have the same goals, we all believe in employment first. We want our clients to be successful and gain and maintain employment.</p>	<p>We understand that some vendors feel that these changes do not include enough money. However, in our cost model we will be spending at least 18% more to serve the same number of clients. Given that our budget is fixed, we are already going to have to find minimally 18% saving somewhere else in a thin budget, while providing services to a the populations served with these services and those served with other services. If our clients cannot be served in this model we will be forces to look at other ways to achieve similar outcomes.</p>	
<p>Lowering the placement and retention rates for customized employment. Customized placements are VERY challenging. We recently placed 2 significantly disabled folks in job carves. One job took 12 months to develop and the other took 14 months to develop. We understand that VR wants to bring more money up front, but by taking away Job Preparation and lowering the rates for customized employment is not going to help vendors succeed. I like the fact the VR is proposing 3 tracks instead of 2, but the rates need to be reevaluated.</p>	<p>In these situations how we wonder how job preparation services would have benefited the client to get a job quicker.</p>	
<p>If we are still working with current clients when this new contract goes into effect will the new payment structure apply to services provided to them?</p>	<p>The transition process is being worked out with OCP and will be part of our training. Stay Tuned!!!!</p>	
<p>I am currently working with a client who is semi-literate and needs help with all employment applications. Can there be payment when the need is this intense?</p>	<p>Job development is really about the hidden market, applications should really be coming after the relationship is established with the employer. Therefore the need for applications should be minimal.</p>	

DHS Vocational Rehabilitation 2015 Proposed Job Placement Process Feedback Responses and Edits

Feedback	Response	Edits Made
As a Job developer do we need to reapply to become a vendor, at the start of the new contract?	Yes.	
When will we get the rates for other services not related to direct job placement?	They are currently posted on the website.	
Can vendors sign up to be VR contractors between now and October 1st?	No.	
I had read something about tracking time spent on job development activities. Is this a new requirement in the monthly reports?	No, that is not the intention of the new report.	
For youth transition students or adults with no work experience seeking a vocational goal that requires experience - will volunteer experiences be set up outside the contract? If that individual needs support to participate will that be outside the contract also?	The line between inside and outside the contract is one that VR is trying to get away from. If a client requires work exposure beyond a TVA then a volunteer experience is something a counselor can set up.	