Action Request Transmittal
Vocational Rehabilitation

Howard Fulk, Policy and Training Manager  

Authorized signature

Number: VR-AR 20-04
Issue date: 4/3/2020

Topic: Covid-19 Interim Operational Guidance

Due date: 4/3/2020

Subject: VR Virtual or Phone Meeting Guidance in Response to Executive Order 20-12

Applies to (check all that apply):

☐ All DHS employees
☐ Area Agencies on Aging: {Select type}
☐ Aging and People with Disabilities
☐ Self Sufficiency Programs
☐ County DD program managers
☐ Support Service Brokerage Directors
☐ ODDS Children’s Residential Services
☐ Child Welfare Programs
☐ County Mental Health Directors
☐ Health Services
☐ Office of Developmental Disabilities Services (ODDS)
☐ ODDS Children’s Intensive in Home Services
☐ Stabilization and Crisis Unit (SACU)
☒ Other: All Vocational Rehabilitation staff

Action Required:
This Action Request (AR) describes temporary measures Oregon Vocational Rehabilitation will undertake as we continue to provide services in accordance with Executive Order 20-12 “Stay Home, Save Lives.”

This AR is the first of several Action Requests to address temporary measures undertaken to guide us through this period.

Effective immediately, and continuing until this directive is rescinded, field staff will follow the telework procedures described below when conducting meetings with clients, partner agencies or vendors for Vocational Rehabilitation services.

Other than the specific guidance provided in this Action Request, no other Vocational Rehabilitation procedures have been amended or changed and normal operating procedures should be followed accordingly.

Please note that additional guidance around plan extensions, annual reviews and intake and orientation processes will be provided in separate guidance shortly.
Any questions surrounding procedures outside of this Action Request should be addressed to your branch manager.

Questions regarding this Action Request should be addressed to mailto:howard.r.fulk@dhsoha.state.or.us.

**Reason for Action:**

Due to the ongoing COVID-19 crisis, Vocational Rehabilitation is making several interim changes to how we do business to ensure our continued and ongoing services to Oregonians with Disabilities. These changes are to fulfill federal performance expectations for the program and meet health and safety considerations.

Per RSA guidance, State VR programs should:
- Continue to provide service delivery, and
- Meet established timelines for eligibility, plan development and plan revisions.

One method our agency can utilize to continue to meet our obligations is through the use of virtual meetings. Effective immediately, to the greatest extent possible, all meetings should be conducted either virtually or telephonically to the greatest extent possible.

Safety and caution are paramount. The health and safety of participants, advocates, community partners, vendors and VR Staff are of utmost importance during this crisis. Every effort must be made to protect everyone involved.

**Mail handling:**
Please observe proper protocols when handling mail, documents or other items. More complete guidance will be provided shortly.

**Virtual and/or Telephonic Meetings:**
All client and vendor meetings should be conducted virtually to the greatest extent possible. This includes routine and required check-ins with current VR Clients. We recognize the importance of the counselor and client face-to-face interactions to build rapport. Further, we understand the challenges and consternation that these interim measures may cause. Please recognize that these measures are temporary and exist solely in order to continue to provide essential services to Oregonians with Disabilities while we comply with the Governor’s Executive Order 20-12.
Vocational Rehabilitation staff are responsible for and must ensure that:

- Any needed accommodations are provided to individuals seeking to engage with our program.
- If spoken language interpreting, CART captioning or sign language accommodations are needed, the VRC should coordinate with Sheila Hoover to ensure these services are available in a timely fashion.
- All forms that may be covered during the meeting should be completed in draft and mailed to the applicant prior to the meeting if possible.

- Prior to sending any correspondence to an individual:
  - Please verify with the person their ability to receive mail, and,
  - Obtain their permission to send documents to them via the USPS.
  - Case note this information in their case file, and
  - Document any special handling instructions the individual may request.
  - Always supply a self-addressed pre-paid envelope to return of any documentation that may be required.

- During the meeting, counselors should:
  - Seek client involvement just as it would be if the meeting were taking place within the VR office setting.
  - Note: Lack of comment from the client does not always constitute understanding or consent.
  - VR staff should seek and obtain the client’s confirmation during each step of the process. VRC’s should case note this exchange and clearly document the client’s response as necessary. Additionally, should changes be required to any documentation, VRC’s must also seek confirmation from the client that they agree, and case note this agreement as necessary.

- Following the completion of the meeting:
  - If there are documents that need to be signed, those should be completed, signed and then dated by the counselor and mailed to the client for their signature.
  - A self-addressed, prepaid envelope should be included to facilitate the timely return of all necessary documentation.

Please see attached flowchart for additional guidance.

**Email and Security**

If emailing the documentation is more convenient for the applicant, documentation may be shared through one of the following methods and the printed and signed document returned to VR via a self-addressed, prepaid envelope provided to the individual.
• Note: Always send these files securely by using the #Secure# tag in the email subject line.
• Documents may be scanned and emailed from the VRC’s office: Note, this does not include Authorizations for Purchase (AFP’s). These will be addressed in future guidance.
• Documents may be scanned using the Microsoft Lens Application on your State iPhone and emailed from the members state email account.
  o Texting the document as an attachment is not permitted
  o Use of a personal email account by the VRC is not permitted

Printing and storing confidential documentation
It is understood that during telework situations, some documents may need to be generated at a VR employees place of residence.
• Under no circumstances should any information be stored or maintained on a personally owned computer, tablet or other electronic device.
• Confidential work should be done via remote desktop or Citrix application,
• All draft, working copy or final copy documents will be stored on the users work computer, not their home device.

If hard copy documents must be printed at an employee’s residence; these documents must be treated as confidential and only generated if no other option is available. As an example, if documents must be generated and mailed, they should be printed and immediately placed in the mailing envelope and sealed for posting. It is preferable to electronically generate documents and send these to the office location for printing if at all possible.

Return completed documents to the VR office
• Completed, signed documentation should be returned to the VR office and not to the VRC’s home.
• Once this documentation has been received by VR, all information must be entered into ORCA within one-business day of receipt.
• Original documents should continue to be handled in the same manner as done previously, and,
• Document handling procedures are not amended by this Action Request.

Documenting delays in case notes
When, due to delays incurred in mailing, there are discrepancies between the date a VRC signs a document and the participant signs the document, the VRC will case note the receipt of the client’s signature page into ORCA and file that copy in the case service record.

Case Note Example
   Entry Date: <Date of actual Virtual/Phone Meeting and Agreement>
   Category: Other or Phone Call
Summary: Virtual Meeting for <Enter reason for meeting>
Phone Meeting for <Enter reason for meeting>

Enter Case Note:
Under the interim guidance of VR-AR-20-04, and in compliance with the Governors Executive Order 20-12 requiring mandatory personal distancing, <a virtual/telephonic> meeting was conducted. <State what actions were taken and specifically list any documents mailed/received and what that next steps will be>
The client also understands, by verbal confirmation, that <state what client has agreed to>
The client verbally attested that upon receipt of <state what documents were mailed to the client if applicable>, they will sign and mail the signature page back to VR within two business days of receipt.

In Person Signature Meetings:
If an individual prefers to sign documents in person at the VR Office, office visits for client signature will be handled by appointment only.
- A daily schedule of these appointments should be shared with staff onsite.
- Personal distancing and related coronavirus prevention/management measures will always be maintained.

When preparing documents in the office to be given to the client by another staffer, use client first name/last initial for identification purposes only.
- Include client’s cell phone/email address in case office staff need to reach the client.

Client signature appointments should last no longer than 10 minutes.
- When the appointment is made with the individual this timeline should be discussed.
- No other VR business should be conducted during the in-person appointment.
- The staff member obtaining/facilitating the signature does not have to be the VR Counselor of record.

To maintain confidentiality, documents for signature should be placed in individual envelopes marked with the:
- Appointment date/time;
- The client’s first name and last initial; and
- The VRC’s name (to assist the signed document being returned to the correct caseload/file).
These envelopes should be maintained at a central location in the branch.

Clients are not to loiter in the office before or after the document has been signed.
Clients will be escorted to/from the entrance of the office by whomever is on duty to unlock and re-secure the front doors.

If there are more than one client coming in for appointments, then they should be allowed to enter one at a time for completion of paperwork.

- Individuals who are waiting can wait outside the office or give their cell phone number and wait in their vehicle and,
- VR staff can call them to come into the office when they are available for the next appointment.

Staff on duty to facilitate client signatures should be rotated.

- No specific classification or staff member is to be designated as solely responsible for covering this duty.
- Rotating staff members assigned to cover client signature appointments manages infection risk for all staff onsite.

Branch staff may choose to create a specific area near the entry to manage client signatures and limit exposure within the office.

- This area must meet ADA accessibility and COVID-19 protection precaution rules and standards.

Field/stakeholder review:  ☒ Yes  ☐ No  
If yes, reviewed by:  VR Executive Team, Branch Managers, Field Staff

If you have any questions about this action request, contact:

**Contact:** Howard Fulk

Phone:  Fax:  
mailto:howard.r.fulk@dhsoha.state.or.us