

12-2-16

## **Frequently Asked Questions from VR/ODDS stakeholder/staff call on recent policies including 20 Hour Standard for Planning and Maintenance Job Coaching**

**Question:** What if an individual needs the maintenance job coaching rate for more than one year?

**Answer:** People absolutely can ask for a renewal through their service coordinator or personal agent for job coaching even if they have already had maintenance job coaching for one year.

**Question:** There was a recent transmittal suggesting that a service such as Attendant Care (OR526) might be the appropriate service if the support needed to maintain employment is mainly Activities of Daily Living (ADL/IADL). I provide case management for a woman who is participating in a work experience that would otherwise be considered employment-path because she was not competitively hired. She requires 1:1 Attendant Care due to ADL/IADL support and the team authorized OR526 to support her in this position. How should the Career Development Plan (CDP) be completed in this instance? While she is not working in integrated employment, she is not participating in employment path, Discovery, or another time-limited service either.

**Answer:** With the assumption that the person's employment situation is fully described above, the person's plans for the upcoming year are best described by the selecting from the options under "Currently not employed and chooses to" on the CDP page. Due to her unique circumstances, you may still check the "Explore" option, you might just want to make a note in one of the barriers boxes below to say that she will be using OR526 rather than an employment service. Of course, the "Desired Employment Outcomes" Section in the CDP must correspond to those selections. If you have questions, contact either Julie Huber or your regional ODDS employment specialist.

**Question:** As a provider we are submitting drafts of the requests to the brokerage that are being questioned as to whether they need job coaching any longer. The Personal Agent/Service Coordinator (PA/SC) is re-writing the request and removing key pieces as a provider we believe are important to be included. Is there a way for a provider to submit additional documentation to be consider when

ODDS looks at these, (statements, examples of visual structure used for fading, photos, etc...)? This will insure that ODDS has the complete information on hand.

**Answer:** In the newest transmittal sent out (Action Request 16-080), we really strongly suggest always erring on the side of caution around whether to make the request and to ensure all needed information is included. The last thing anyone wants is for someone to lose a job or have their job at risk so err on the side of requesting coaching if there is a disagreement. In addition, providers should call or send an email to discuss a situation with us if there is strong disagreement between the provider and Brokerage or Community Developmental Disabilities Program (CDDP). Please remember to talk to the individual receiving services. What do they feel they need and what comes next for that person? This needs to be a team effort, with the individual leading the team.

**Question:** Brokerages/CDDPs are still not contacting providers for input in the ISP process and development of the Career Development Plan. When looking at CDPs to create action plans/strategies to accompany the Maintenance Requests, they are empty or vague. We had a great conversation with our local brokerage on this problem and have been instructed if we see empty or incomplete CDPs to let the management know. It would be more helpful to have involvement in the process but are being told that is up to the individual?

**Answer:** It is up to the individual who comes to their ISP meeting, so if they want a provider then the provider should be invited. Sometimes perhaps the individual may only want their family member and service coordinator or personal agent depending on the meeting. However, as part of the Career Development Plan, we do require implementation strategies from the provider so it is important that communication is happening with the entire team, even if it is not during the ISP meeting. This may include Provider Action Plans, Service Agreements, or providers may use their own template or form. These implementation strategies should be discussed with the individual and included as part of the ISP.

**Question:** I would like clarification on the expectation that providers are responsible for tracking what the person is earning and their benefits when they are directly hired by a business in the community. Business will not always share this information with providers. People receiving our support may not be accurate reporters of current wages or benefits. OAR411-345-0085 Employment -Progress notes- (C) At least every six months, documentation of the number of hours the supported individual works, the wages and level of benefits, as well as any opportunities presented to the individual for increased work hours.

**Answer:** In order to fund job coaching, ODDS has to be able to verify that the service meets the requirements of job coaching. The Workforce Innovation and Opportunity Act (WIOA) requires VR to verify and document wages and benefits at case closure. One requirement is that the individual earns the same wages and benefits as anyone else working that job. While we understand that sometimes collecting this information can be challenging, ideally this can be coordinated with the individual or team. If there is a specific situation where this has come up, please contact DHS.

**Question:** What is the suggested strategy for tracking how many months of ongoing job coaching an individual has used given that the 18-month limit is not tracked as 18 consecutive months and not everyone utilizes ongoing job coaching in consecutive fashion (seasonal positions, taking a month off from a job, etc.)?

**Answer:** We are working on a report that will be embedded into Plan of Care. It will show you how many people on your caseload are coming up 18 months counting backwards (i.e. who has had 18 months, 17 months, 16 months, 15 months, 14 months, 13 months, 12 months). It also will indicate if there was a gap in employment or job coaching. We are hoping that report will be in Plan of Care by Feb. 1, 2017 and if it is not we will coordinate with CDDPs and brokerages to help track this.

**Question:** How do we know if 18-months have been used if a job coach is a couple months behind on their billing? There could be scenarios in which 15 months have been used, and then a job coach submits three months of billing, very suddenly reaching their 18-month limit. In the time it takes to put together a request and get it approved (transmittal states ODDS needs requests in 30 days prior to On-going Job Coaching expiring), there could be a lapse in much needed support.

**Answer:** In these cases, we would always err on the side of the individual and what it takes to keep their job. If there is error or delay in billing, and it takes 30 to 60 days for us to review, then we can continue ongoing supports until we are able to make a formal decision on maintenance job coaching.

**Question:** How will direct contact requirements be tracked? The transmittal indicates that ODDS will verify that the required number of monthly direct contacts authorized by the ISP have been provided and will reconcile billing in months where that requirement has not been met. Will eXPRS have an area on the POC for case managers to indicate the number of monthly direct contacts required

by the ISP and likewise for providers on the SDE page to indicate how many direct contacts they provided? If not, will ODDS be responsible for verifying this number by having to cross check an individual's ISP with a provider's invoices? If not, would this responsibility fall to Case Managers?

**Answer:** In Plan of Care, there is a place where the provider must enter the hours the person worked and the direct contact time. ODDS can monitor the requirements (i.e., four face-to-face contacts during initial job coaching, two face-to-face contact during ongoing job coaching) but unless we are doing an audit, we will not know if there are higher requirements outlined in the ISP or Service Plan. We do ask the SC or PA to track and monitor this.

**Question:** Who is responsible to pay/request for sign language interpreters to accommodate those who have communication barriers? This is a critical accommodation for any participants who are Deaf, Hard of Hearing and Intellectual and Developmental challenges.

**Answer:** ODDS and VR are working on a grid that discusses different services and who pays for interpreters for each service. For instance, we are building into Plan of Care a way that translators can bill us directly. For job coaching, it may be the provider that pays for the interpreter. Sometimes VR pays depending on the situation. Other times it may be the employer as an accommodation. It really varies depending on the service. Please reach out if you have questions on a specific service and interpreter services and we will try to find the answer.