Questions from June 6, 2017 Stakeholder Call

Frequently Asked Questions (F.A.Q) regarding employment policy questions for Office of Developmental Disabilities Services (ODDS) and Vocational Rehabilitation (VR) on 20 Hour Policy, Job Coaching and Stabilization, Competitive Integrated Employment Transmittal, and Sub-Minimum Wage Requirement for Workforce Innovation and Opportunity Act (WIOA). These questions are taken from a call with the field and stakeholders held on June 6, 2017, as well as other inquiries sent in via email.

Introduction: ODDS reminded stakeholders of the 20 Hour Standard for Planning Employment Services and also reminded callers of the Worker Guides for Employment Stabilization and also for Job Coaching. There is also a recent Worker Guide on Competitive Integrated Employment.

VR gave an update on career counseling happening statewide for people making sub-minimum wage. WIOA requires that VR annually provide career counseling services to those they know are making less than federal minimum wage. Those meetings are currently happening. A form is filled out during this meeting. This form may be useful for Personal Agents/Service Coordinators to help align with their Career Development Plan. Individuals are also given a brochure from VR and from the Client Assistance Program (CAP), which is the formal program that addresses complaints and grievances on VR services.

Questions and Answers:

**Question:** Please address the service of Job Coaching (both initial and ongoing) as it relates to overall utilization between VR and DD.

**Answer:** In the [job coaching worker guide](#), it does go over initial job coaching. The Initial Job Coaching rate paid through ODDS is valid for the first six months for which an individual receives job coaching at an integrated job. This time includes any job coaching already provided through VR. For instance, if an individual receives Job Placement services through VR and receives job coaching supports through VR for the first 60 days (i.e. two months) on the job, the ODDS Initial Job Coaching rate would only continue to be applicable for four additional months. In this scenario, a Services Coordinator (SC) or Personal Agent (PA) may only authorize four months of Initial Job Coaching in Plan of Care.
This scenario is only true for Initial Job Coaching. For Ongoing Job Coaching, the 18 months allowed does not include any time in VR.

**Question:** Can we make it a requirement that the VR Individualized Plan for Employment (IPE) must be copied to the DD Case Management Entity (Service Coordinator/Personal Agent)?

**Answer:** ODDS and VR cannot require for an IPE to be shared with the Service Coordinator or Personal Agent – this is a decision that is up to the individual. The Stabilization Policy states that it is best practice for the IPE to be shared with the team, including the SC or PA. Team development is encouraged with all plans. The IPE should reflect the ISP and ISP should reflect the IPE. ODDS also encourages the Career Development Plan to be shared with the VR counselor.

**Question:** Can it be a requirement that a service coordinator or personal agent is consulted prior to completion of the IPE if it contains services that DD is expected to provide beyond VR’s services?

**Answer:** The entity that authorizes the service must be the one that pays for and provides that service. ODDS cannot authorize a VR specific service, just as VR cannot authorize an ODDS service. Requests for ODDS services after an individual is referred to VR needs to be a team decision and by request. Best practice encourages braiding and blending of services as determined by the individual’s unique needs.

**Question:** What if the first bit of Initial Job Coaching can be counted as part of “stabilization” and should be included in VR’s IPE? Are there any process maps that reflect how teams should move through the IPE with VR and then transition at a point where successful placement is made back to the DD ISP?

**Answer:** Federal regulations require that we cannot specify a certain date for stabilization. Stabilization is is based on the individual and determined with their VR counselor with input from their team. Individual case-by-case situations are used to determine when someone is stable on the job. Worker Guide 17-021, the Stabilization Guide, gives a process map and details on how this should work. Services should be authorized prior to stabilization to ensure smooth transfer and no interruption of services. Early and ongoing communication between a VR counselor and SC/PA facilitate transfer of job coaching at stabilization.
**Question:** What is the process of helping someone get job coaching when they haven’t yet had a referral to VR but found a job?

**Answer:** The Stabilization Worker Guide outlines the process for this. If an individual is stable, as defined in WIOA and the Worker Guide, the team can get together and discuss whether a referral to VR is needed. Again, most of the time a referral is needed, even if they went through Discovery. But we do allow for 30 day authorization by SC/PA to allow job coaching until referral is done. There is an exception process if it takes more than 30 days. There is also the process to go straight to ODDS for job coaching and bypass VR if the person is stable and doing well in their job and wants to go straight into job coaching. There is no reason for a person to lose services or be at risk of losing their job.

**Question:** What service categories can be used for assessment or training for I/DD individuals who are in job development, have completed Discovery, and where the provider has found an individual community employer who has the interest and potential in hiring the individual but wants a work experience longer than eight hours to see if there is a match?

**Answer:** The VR Job Placement Services Contract Technical Assistance Guide outlines the service categories. It takes a team effort, including the job developer, to come up with a strategy to find a person a good job fit utilizing the most appropriate techniques for the individual.

**Question:** Why do we need to notify ODDS central office when we authorize job coaching without VR referral?

**Answer:** This is for data collection and tracking purposes. It allows ODDS to understand and track new jobs that did not go through VR. In addition, some stakeholders expressed concern that individuals going through DD would not have the same retention or success rate as ones that went through VR. This allows the state to track this information to make sure this policy is working as intended.

**Question:** If somebody gets a job on their own and did not go through VR, is it possible to be paid for helping them retain that job? As a provider, we helped with job stabilization and retention that was not job coaching.

**Answer:** If you bypassed VR and went straight to DD funding, you can only get job coaching funded by ODDS. If you go through VR, there are two potential
retention fees available, depending on the length of employment. See the VR Job Placement Services Contract Technical Assistance Guide for more information.

**Question:** Can you please clarify what ODDS email (assessments, funding review, etc.) should be used for notifying ODDS that a customer is bypassing VR for job coaching because they found a job independently or via the Discovery process and are stable?

**Answer:** The email is in the Employment Stabilization Worker Guide and is maintenancejobcoaching.request@state.or.us