

# Action Request Transmittal Vocational Rehabilitation



Howard Fulk, Policy and Training Manager

**Authorized signature**

**Number:** VR-AR 20-07

**Issue date:** 4/24/2020

**Topic:** Other

**Due date:** 4/24/2020

**Subject:** Covid-19 Interim Operational Guidance: Vocational Rehabilitation (VR) Virtual Intake and Orientation Guidance in Response to Executive Order 20-12

**Applies to (check all that apply):**

- |  |  |
|--|--|
| <input type="checkbox"/> All DHS employees                     | <input type="checkbox"/> County Mental Health Directors  |
| <input type="checkbox"/> Area Agencies on Aging: {Select type} | <input type="checkbox"/> Health Services   |
| <input type="checkbox"/> Aging and People with Disabilities    | <input type="checkbox"/> Office of Developmental Disabilities Services (ODDS)                            |
| <input type="checkbox"/> Self Sufficiency Programs             | <input type="checkbox"/> ODDS Children's Intensive In Home Services                                      |
| <input type="checkbox"/> County DD program managers            | <input type="checkbox"/> Stabilization and Crisis Unit (SACU)  |
| <input type="checkbox"/> Support Service Brokerage Directors   | <input checked="" type="checkbox"/> Other ( <i>please specify</i> ): All Vocational Rehabilitation staff |
| <input type="checkbox"/> ODDS Children's Residential Services  |  |
| <input type="checkbox"/> Child Welfare Programs                |  |

**Action required:**

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

Effective immediately and continuing until this directive is rescinded, field staff should follow the procedures described below when conducting Orientations, Intakes or Meetings with individuals applying for Vocational Rehabilitation services.

Having now successfully transitioned to a largely virtual office environment, Vocational Rehabilitation's will begin accepting new intake appointments effective May 1, 2020.

Effective immediately and continuing until this directive is rescinded, field staff should follow the procedures described below when conducting Orientations, Intakes or Meetings with individuals applying for Vocational Rehabilitation services.

## Procedures

### **Scheduling Virtual Orientations:**

If your office conducts Vocational Rehabilitation Orientation meetings prior to scheduling new applicant intake appointments, please schedule these via Skype, Zoom, or other alternative telecommunication platform appropriate to the circumstance.

- **Orientations are always optional:** A prospective applicant's intake should not be delayed solely to attend an orientation meeting prior to offering an intake appointment.
  - There is no statutory requirement for an orientation prior to intake.
  - The [VR Orientation Video](#) may be used as appropriate.

It is recommended that any documentation normally provided during your orientations be mailed, emailed or faxed to the applicant prior to the virtual orientation meeting.

- Alternately, if the applicant declines a virtual orientation prior to intake, you may provide these materials to the applicant before the initial intake meeting.
- Any documents exchanged with an applicant via email must be both sent and received securely. (See [VR-IM 17-06](#).)

### **Accommodations must be provided**

VR staff should coordinate with Sheila Hoover to ensure that CART captioning, language translation, or sign language accommodations needed are available in a timely fashion.

- It is Vocational Rehabilitation's responsibility to ensure that any needed accommodations are provided for all applicants throughout the VR process.

Please remember that it is still the VRCs responsibility to ensure that any accommodations needed by the client to help them review and understand these documents be made readily available and provided as needed.

### **Virtual Intake Meetings**

In accordance with [VR-AR 20-04](#), intake meetings should be conducted virtually to the greatest extent possible.

When scheduling appointments, offices should continue to use the processes in place prior to the Governor's Executive Order 20-12.

- Appointments should continue to be made in the order in which they are received to the greatest extent possible.
- Virtual meetings are an option or tool for counselors and staff to consider and should be the first choice when appropriate.

Virtual meetings may be done using the following platforms:

- Skype
- Zoom
- Facetime
- Telephone

If virtual meetings are not an option, VR is still required to accept applications and to process intakes in accordance with all federally established guidelines.

We recognize the importance of the counselor/client face-to-face interaction in building rapport. We recognize and understand the challenges that virtual meetings may cause.

- Please remember that these measures are temporary and exist solely to allow VR to continue to provide essential services to Oregonians with Disabilities while we comply with the Governor's Executive Order 20-12.

### **Send Documents to be Reviewed Prior to Virtual Intake**

While not required, it is recommended that service questionnaires or personal information forms be sent to the applicant prior to the meeting to provide the VRC with additional information to facilitate the meeting discussion.

All forms to be covered during the intake process should be left unsigned and provided to the applicant prior to the meeting.

These documents may be mailed, securely emailed, or faxed to the individual.

- A self-addressed, prepaid envelope should be included to facilitate the timely return of all necessary documentation if documents are sent via USPS.
- Add the counselor's name on the return envelope to assure the mail is directed appropriately before the virtual intake.
- Use of a personal email account by the VRC is not permitted
- Documents may be scanned using the Microsoft Lens Application on your State iPhone and emailed from the members state email account.
- Texting the document as an attachment is not permitted

### **Conducting and Documenting the Virtual Intake**

During the virtual intake appointment, applicant involvement and understanding must be sought just as it would be if the meeting were taking place within the VR office setting.

- Note: Lack of comment from the individual does not always constitute understanding or consent, counselors must work to ensure that the person is actively engaged and is understanding the conversation.

- VRCs must actively seek and obtain the individual's confirmation during each step of the application process.
- VRCs should case note this exchange and clearly document the individual's response as necessary.
- Should changes be required to any documentation, VRCs must again seek confirmation from the individual. Document this agreement in case notes as necessary.

### **Completing the Virtual Intake – Review Forms**

At the completion of the interview VRCs should:

- Verify that the individual has signed or initialed all forms as appropriate.
  - The applicant's signature must be handwritten.
- Then discuss how to return the documents to VR.
  - The method must meet all DHS/VR security requirements.

Documents may be mailed by USPS back to a VR branch office.

- Completed documents may not be mailed directly from an applicant to a private residence.
  - Assure the counselor's name is on the return envelope so the information reaches them.

Other methods may be considered, based upon the VRC's professional discretion.

- Documents may be scanned and emailed securely back to the VRC.
- Documents may be photographed by the individual and emailed securely back to the VRC.
- Documents may not be sent via text as an attachment.

Again, staff must assure the method meets all DHS/VR security requirements.

### **Client Identification for Services:**

To be eligible to receive services from Vocational Rehabilitation, an individual must be legally able to obtain employment within the United States.

- VR uses the [Federal I-9 standards of identification](#) for this purpose.

While we operate under this interim virtual application and eligibility process, VRCs must rely on their professional training and judgement to validate a client's identification to the greatest extent possible.

- Additional guidance on verifying an individual's authority to work may be found in [VR-AR 19-05](#).

- Further questions surrounding what identification is acceptable for identification verification may be addressed by referring to the [I-9 document](#) itself.
- While a person need not be physically present to apply for VR services, the individual must be available to participate in program services in order to be deemed eligible.

The Program can request that a client send us photocopies of their identification.

- However, the Program may not require a person to photocopy, email, fax or mail an original or copy of any form of state or federal identification.
- If an individual is uncomfortable with copying and sharing their identification in one of these formats, the VRC should ask the person to display their identification to the camera they are using during the virtual intake. The VRC should attempt to make a reasonable identification based on this exchange.
  - The VRC should ask the applicant if they are comfortable with a screen shot being made of the applicant's identification while they are displaying it to the camera.
  - If the applicant agrees with this action, the VRC may take a screen shot and use this as part of the file.
- Under no circumstance should an applicant mail an original document to VR.

### **Validating Identification**

To validate a person's identification while VR is operating under the interim Action Request due to the Governors Executive Order 20-12, applicants should provide us a clear (clean and legible) copy of their identification documents.

- These documents must meet the [I-9 standards](#) required to prove eligibility for employment within the United States.
  - Preferably a color copy if possible.
  - The applicant may send a clear photograph of the documents if they are unable to scan the documents.
- An applicant's identification may be submitted to the VRC:
  - Via USPS
  - Via Secure Email (Preferred method when possible)
  - Via Fax
- An applicant's identification may NOT be submitted to the VRC:
  - Via Text Messaging
  - Via unsecure Email
  - Any method not otherwise described as acceptable above

If an applicant is unable or unwilling to provide positive identification in an acceptable manner described above, a face-to-face meeting may be required to validate the persons identification in order to move from application to eligibility status.

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## Assure Applicants Sign Documents:

Many of the forms required to complete the application and intake process require signatures by both VRC's and applicants.

- Documents may be mailed via USPS or sent through secure email if this is acceptable to the individual. VR staff should:
  - Track when documents are mailed, and,
  - Ensure the applicant receives the documents mailed, and,
  - Follow-up with the applicant or clients, as necessary, to assure documents are signed and returned.
- Client Signature Dates will be different from VRC signature Dates on the application for services.
  - This difference must be documented within a case note along with an explanation of why this variance has occurred.
  - The VRC's signature date must match the date entered into ORCA.
    - The counselor signature confirms the application is complete and VR now has what is needed to initiate assessment for eligibility
    - Additionally, the counselor will case note the difference in applicant signature and the date the case is initiated in ORCA due to social distancing associated with Covid-19.

## Emailing Documents for Signature:

If emailing the documentation is more convenient for the applicant, documentation may be shared through one of the following methods. Following printing and signing the documents, they can be returned to VR via a self-addressed, prepaid envelope provided to the individual prior to the [virtual intake appointment](#).

- Documents may be scanned and emailed from the VRC's office.
- Documents may be scanned using the Microsoft Lens Application on your State iPhone and emailed from the members state email account.
  - Texting the document as an attachment is not permitted
  - Use of a personal email account by the VRC is not permitted
- Any document emailed to or from a client must be both sent and received securely.
  - VRCs should ensure that individuals are familiar with our secure email process and are instructed on using this with all correspondence.
    - Clients may reply to a secure email sent from VR, or
    - Clients may login and send a new email at <https://secureemail.dhsoha.state.or.us/encrypt>

## **Additional Considerations on Document Signing:**

Many of our clients are unfamiliar with some of the technologies we use in our daily business practices. The postal service is the method most comfortable for them.

- Using the DHS secure email process has provided troublesome for some of our customers previously.
- Emailing documents for signature can create barriers for clients that do not have access to a printer.
- Secure emails cannot be opened by an applicant on a nonsecure or public WiFi
- Electronic Signature use outside of internal VR staff has not yet been approved.

Please note that in many instances, the Release of Information Form (3010) cannot be opened by the recipient when emailed directly as a form.

- The VRC should complete the form and save via the “Print to PDF” option. Then send the saved document.

## **In-Person Meetings:**

In-person meetings are highly discouraged at this time. If a face-to-face meeting is the only available alternative, all physical distancing requirements as outlined in [VR-AR 20-04](#) must be followed as well as guidance provided below.

Virtual appointments are the preferred method of conducting business at this time.

- However, if a client is not comfortable with using this tool, VR is required to continue to meet all previously established rules and timelines for processing an individual’s application.
- Each office should develop its own procedures that follow these precautions to meet their unique building and office needs.

If an individual prefers in-person meeting at the VR Office, the branch manager, the counselor, and the individual must agree to this meeting.

Additionally, the following requirements must be discussed prior to arranging the meeting:

- Office visits 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.
- While guardians, advocates and support team members are always encouraged to attend meetings between the individual and VR, it should be stressed that no unnecessary people should be attending appointments in-person at this time.
- In-person appointments should last no longer than necessary. Physical distancing standards will be maintained throughout the meeting.



Prior to the appointment these expectations should be discussed with the client (and with others if they are planning on attending the appointment) so that the appropriate social distancing can occur during the meeting.

If the applicant is visiting VR solely to provide a signature, the staff member obtaining or facilitating the signature need not be the VR Counselor of record.

Clients are not to loiter in the office before or after an appointment.

- 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, they should be allowed to enter one at a time and escorted directly to the appointment location.

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

### Case note Example for Virtual Intake:

**Entry Date:** Date of actual Virtual/Phone Meeting and Agreement

**Category:** Other or Phone Call

**Summary:** Virtual Meeting for Client Intake and Agreement

#### Enter Case Note:

Under the interim guidance of VR-AR-20-04, and in compliance with the Governors Executive Order 20-12 this client's intake appointment was conducted virtually due to personal distancing requirements. All required intake forms, to include the applicant's rights and responsibilities, had been mailed to the client prior to this meeting and each was covered individually during our discussion. The client has verbally stated their agreement and understanding of their rights and responsibilities, has been provided copies of the Dispute Resolution Rights and is returning the signed forms to our office via USPS.

**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:*

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