

Action Request Transmittal Vocational Rehabilitation



Howard Fulk, Policy and Training Manager

Number: VR-AR 20-07 rev

Authorized signature

Issue date: 04/01/2022

Topic: Other

Due date: 04/01/2022 rev

Subject: UPDATED Operational Guidance: Vocational Rehabilitation (VR) Virtual Application

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	<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
<input type="checkbox"/>	Support Service Brokerage Directors	<input type="checkbox"/>	(SACU) Child Welfare Programs
<input type="checkbox"/>	ODDS Children’s Residential Services	<input checked="" type="checkbox"/>	Other: Vocational Rehabilitation

ACTION REQUIRED:

This Action Request (AR) provides considerations when conducting orientations, applications, or meetings with individuals applying for Vocational Rehabilitation services. Orientations, application or meetings with individuals applying for VR services may be in person or virtual.

PROCEDURES

Orientations may be virtual:

If your office conducts Vocational Rehabilitation Orientation meetings prior to scheduling new applicant application appointments, the orientation may be in person

or via Teams, Zoom, or another alternative telecommunication platform appropriate to the situation.

- **Orientations are always optional:** A prospective applicant's application should not be delayed solely to attend an orientation meeting prior to offering an application appointment.
 - There is no statutory requirement for an orientation prior to application.
 - 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 application, you may provide these materials to the applicant before the initial application 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 VR.Fieldservices 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.
- Use of a personal email account by the VRC is not permitted

Please remember: It is the VRC's 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.

Application meetings may be virtual

VR is required to accept applications and to process applications in accordance with all federally established guidelines.

Application meetings may be conducted in person or virtually.

When scheduling appointments, offices should continue to:

- Assure appointments are made in the order in which they are received to the greatest extent possible.
- Consider virtual meetings as an option or tool for counselors and staff.

Virtual meetings may be done using the following platforms:

- Teams
- Zoom
- Facetime
- Telephone

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 choose the meeting strategy with the applicant (and their parent or guardian or team members) that is most appropriate.

Send Documents to be Reviewed Prior to in person or virtual Application

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 application 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.

If the application is virtual:

- 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 application.
- The VRC must use their ODHS work email account to share documents.
- Documents may be scanned using the Microsoft Lens Application on your State iPhone and emailed from the member's state email account.
- Texting the document as an attachment is not permitted.

Conducting and documenting the in person and virtual application

During the in person or virtual application appointment, applicant involvement and understanding must be sought.

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

Completing the in person or virtual application – review forms

At the completion of the interview the VRC should:

- Verify that the individual has signed or initialed all forms as appropriate.
- The applicant's signature must be handwritten.

If this is a virtual application, 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 to return the signed documents 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 ODHS and 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.
- 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.

If the application is virtual, the Program can request that a client send the VR Program 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 application. 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, applicants must provide us a clean, 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 clean, legible 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 is required to validate the person's identification in order to move from application to eligibility status.

Assure applicants sign documents:

Many of the forms required to complete the application and application process require signatures by both the VRC and applicant.

If the meeting is virtual:

- 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 ensure:
 - The documents are received, and
 - That the documents are signed and returned.
- Client Signature dates will be different from VRC signature dates on the application for services.
 - Document why the dates are different in a case note and explain why this variance has occurred.
 - The VRC's signature date must match the date entered in ORCA.
 - The counselor signature confirms the application is complete. Now VR 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 client concerns related to Covid-19 or other reasons for the virtual application.

Emailing Documents for Signature:

If emailing the documentation is more convenient for the applicant, documentation may be shared through one of the following methods. After 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 application 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://securemail.dhsoha.state.or.us/encrypt>

Additional considerations on document signing:

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

- Using the ODHS secure email process has provided troublesome for some VR 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.
- Some individuals choose not to engage with the electronic form and process for application.
- Some individuals do not have secure, dedicated internet access available to them.

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.

Case note Example for Virtual Application:

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

Category: Other or Phone Call

Summary: Virtual Meeting for Client Application and Agreement

Enter Case Note:

Under the guidance of VR-AR-20-04, this client’s application appointment was conducted virtually at the client’s request. All required application 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.

In-Person Meetings:

State office buildings will reopen to the general public May 1, 2022.

The VR staff person scheduling an in-person appointment may ask the applicant about any preferences for face-to-face meetings.

- The person scheduling the meeting will make note of any requests, and,
- Inform the VR counselor of the requests or preferences.

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

- Intakes will be handled by appointment only. A daily schedule of these appointments should be shared with staff onsite.
- The public may still wear face coverings in VR buildings if they wish.
- Guardians, advocates and support team members are always encouraged to attend meetings between the individual and VR.

These requirements will be discussed prior to arranging the meeting if an in-person appointment is made with the individual.

OTHER RESOURCES:

DAS CHRO FAQ for Executive Branch employees. [Face Masks – April 1, 2022](#)

Field/stakeholder review: Yes No

If yes, reviewed by VR Executive Team, Branch Managers, Field Staff, BIC's

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

Contact(s): VR.Policy@dhsoha.state.or.us	
Phone:	Fax:
Email: VR.Policy@dhsoha.state.or.us	