

Policy Transmittal Vocational Rehabilitation



Howard R. Fulk, Policy and Training Manager

Authorized signature

Number: VR-PT 20-05

Issue date: 08/28/2020

Topic: Other

Due date: 08/28/2020

Transmitting (check the box that best applies):

- New policy
 Policy change
 Policy clarification
 Executive letter
 Administrative Rule
 Manual update
 Other:

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>): Vocational Rehabilitation |
| <input type="checkbox"/> ODDS Children's Residential Services | |
| <input type="checkbox"/> Child Welfare Programs | |

Policy/rule title:	VR-PT 20-05 Prior approval for IPE Purchases		
Policy/rule number(s):	Replaces VR-AR 18-01	Release number:	
Effective date:	08/28/2020	Expiration date:	
References:	Title 2, Subtitle A, Chapter II, Part 200, Subpart E, §200.407 Frequently Asked Questions (FAQs) Prior Approval OSEP and RSA Formula Grants (United States Department of Education, Office of Special Education and Rehabilitative Services, 10/29/2019) David Steele, Fiscal Unit Chief/Acting Data Unit Chief, Rehabilitation Services Administration, Office of Special Education and Rehabilitative Services, 01/11/2019, Email: Disclosure of Personal Information.)		
Web address:	https://www.oregon.gov/dhs/EMPLOYMENT/VR/Pages/Policies-Rules.aspx		

Policy:

VR-AR 18-01 Prior approval IPE Purchases issued on 8/17/2018 is obsolete and should not be used.

Purchase is \$5,000 or more and listed in the IPE

Oregon Vocational Rehabilitation (VR) must track all purchases of equipment of \$5,000 or more included in a clients Individualized Plan for Employment (IPE).

- Expenditures for any item with a cost of \$5,000 or more must be sent to the Business Operations Manager for review and approval prior to purchase.
 - Purchases exceeding \$5,000 may not be made prior to receiving this approval

Purchase is \$5,000 or more and not in the IPE

Oregon Vocational Rehabilitation (VR) must submit all purchases of \$5,000 or more that are not included in a clients Individualized Plan of Employment (IPE) to Rehabilitation Services Administration (RSA) for review and approval.

- VR does not have authorization to purchase any item costing \$5,000 or more, not listed in a client's IPE until approval has been made by RSA.
 - Examples may include, but are not limited to:
 - Hearing aids or;
 - Communication devices
- VR staff should note in their request that the prior approval request is for a service-related cost to be incurred prior to an approved IPE.
 - When submitting attachments with prior approval requests (e.g., bids, estimates, etc.) that contain personal information, personal information must be redacted prior to submission to the Business Operations Manager.
- VR staff must document that the purchase is needed to assure the individual can participate in the eligibility and plan development process, and,
- Purchase cannot take place until RSA provides a written approval to make the purchase.

Use of Non-Federal funds to pay for equipment

The VR Program must submit prior approval requests if non-Federal funds will be used to pay for the equipment that is not purchased under the VR program in accordance with an eligible individual's IPE.

- All Oregon VR funds are federal funds. No purchases are allowed under this category.

Discussion/interpretation:

The purpose of the advance request is to avoid subsequent disallowance or dispute based on unreasonableness or non-allocability.

Per guidance from Rehabilitation Services Administration, if the purchase is included in a client individualized plan for employment (IPE) then no prior approval is needed at the federal level. This is a change from previous policy transmittals.

All equipment purchases over \$5,000 must be tracked against a budget submitted to the Department of Education, RSA. Therefore, these purchases must be submitted.

Applicability:

[Title 2, Subtitle A, Chapter II, Part 200, Subpart E, §200.407](#)

https://www.ecfr.gov/cgi-bin/text-idx?SID=10f34cdb5df1422174358acaaea3bfad&node=se2.1.200_1407&rgn=div8

[Frequently Asked Questions \(FAQs\) Prior Approval OSEP and RSA Formula Grants](#)
(United States Department of Education, Office of Special Education and Rehabilitative Services, 10/29/2019)

<https://www2.ed.gov/policy/speced/guid/faq-prior-approval-10-29-2019.pdf>

David Steele, Fiscal Unit Chief/Acting Data Unit Chief, Rehabilitation Services Administration, Office of Special Education and Rehabilitative Services, 01/11/2019, Email: Disclosure of Personal Information.

Local/branch action required: NA

Central office action required: NA

Field/stakeholder review: Yes No

If yes, reviewed by: Field staff, Branch and Regional Managers, Executive Team and SRC Policy, Legislative & Budget Committee

Filing instructions: NA

If you have any questions about this policy, contact:

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