

Policy Transmittal Vocational Rehabilitation



Howard Fulk, Policy and Training Manager
Authorized signature

Number: VR-PT 20-05
Issue date: 11/06/2020

Topic: Other

Due date: 11/06/2020

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 of Client Purchases Update		
Policy/rule number(s):	Replaces VR-PT 20-05 8/23/2020	Release number:	20-05
Effective date:	11/06/2020	Expiration date:	NA
References:	Title 2, Subtitle A, Chapter II, Part 200, Subpart E, §200.407 Frequently Asked Questions (FAQs) Prior Approval OSEP and RSA Formula Grants (US 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:	OWL;https://www.oregon.gov/dhs/EMPLOYMENT/VR/Pages/Policies-Rules.aspx		

PURPOSE

This policy clarifies the requirement and process needed to request prior authorization when purchasing items for Oregon Vocational Rehabilitation (VR) clients.

The changes in this policy reflect information found in "[Frequently Asked Questions \(FAQs\) Prior Approval OSEP and RSA Formula Grants](#)."

POLICY

This transmittal replaces VR-AR 18-01 and the previously released version of VR-PT 20-05 (issued on 8-28-2020).

- Those transmittals should be considered obsolete and not be used.

Prior Approval for Equipment:

Equipment, in this context, means any tangible personal property having a useful life of more than one-year and a per-unit acquisition cost of \$5,000 or more. ([2 CFR §200.33](#))

Useful life longer than one-year means that a purchased item will have value a year after it is initially purchased. ([Oregon Accounting Manual policy 15.60.20](#))

All equipment with a cost greater than \$5,000 and a useful life greater than one-year requires prior approval.

- Examples of equipment may include (but is not limited to):
 - Motor vehicles including modifications over \$5,000
 - Software packages, computer and/or office equipment
 - Technology equipment and systems
 - Specialized bicycles where the per unit price exceeds \$5,000
 - Rehabilitation Technology over \$5,000

Equipment cost cannot be fragmented into smaller pieces to avoid submission for prior approval.

[Procedures for the Prior Approval of Equipment in the IPE](#) are described below.

Note: VR must submit all purchases of \$5,000 or more that are not included in a client's IPE to Rehabilitation Services Administration (RSA) for review and approval.

[Procedures for the Prior Approval of Equipment NOT in the IPE](#) are described below.

Prior Approval for Participant Support Cost:

Participant support costs (PSC) means the direct costs for items such as stipends or subsistence allowances, travel allowances and registration fees paid to or on behalf of Oregon VR participants or trainees in connection with conferences or training projects. ([2 CFR §200.75](#))

PSCs are allowable if they are incurred for the provision of VR services under individualized plans for employment (IPEs). ([Frequently Asked Questions \(FAQs\) Prior Approval - OSEP and RSA Formula Grants](#) – page 3)

Note: Accommodations needed to enable the VR client to participate in the conference (for example, language interpretation services or American Sign language interpreters), should be included as part of the request made by the VR client during registration. The organization hosting the event should supply them at no cost as part of the event.

Purchase of other communication or assistive technology aids used directly by the client, is generally classified as rehabilitation technology and may not match the definition of a participant support cost.

[Procedures for the Prior Approval of Participant Support Costs](#) are described below.

Prior Approval for Capital Expenditures:

Capital expenditures means to acquire items, make additions, improvements, modifiers, replacement or rearrangements, reinstallations, renovations or alterations that materially increase the value or useful life of real property. ([2 CFR §200.13](#))

Examples would be installation of a ramp at a home or office, or remodel of apportion of a building to accommodate client.

NOTE: All capital expenditure requires RSA prior written approval regardless of the dollar amount.

[Procedures for the Prior Approval of Capital Expenditures](#) are described below.

PROCEDURES:

Process for Prior Written Approval for Equipment included in an IPE

1. When equipment cost exceeds \$5,000 in a participant's Individualized Plan for Employment (IPE), the following information must be submitted by the VRC to their Branch Manager for review.
 - The Branch Manager will review the request, and if approved, forward to the VR Business Operations Manager for review and consideration prior to the purchase being made. This request must include:
 - Participant's Personal Identifier (PID); and,
 - Description of the item needing prior approval; and,
 - Three cost quotes for the equipment in question.
 - Three bids are *not* required when the purchase is:
 - Covered under a medical prescription; or,
 - Are propriety to a specific place or provider; or,
 - Are custom designed for a client; or,
 - Where not multiple options are not available.
 - **Note: Vehicle modifications still require three quotes.**
 - All client expenditures should be made under the expectation that the item being purchased is the least costly option that meets the client's needs and overcomes the barrier to employment.
 - The VRC must document the reason for less than three quotes in the client case file and in the documentation submitted for approval.
 - Do NOT include personal identifying information in the information shared.

NOTE: If the purchase price of the item exceeds the authority of the Branch Manager, appropriate review and approval is required prior to forwarding to the VR Business Operations Manager.

2. The VR Business Operations Manager will review each request and coordinate with the submitting branch manager as appropriate. After review, the approval or denial will be forwarded to the branch manager and original requester.

3. Upon receiving approval from the VR Business Operations Manager, the Authorization for Purchase (AFP) may be issued.
 - The VRC must include the written approval from the VR Business Operations Manager with the file attached to the AFP.

Process for Prior Written Approval for Equipment NOT included in an IPE

Purchases of client equipment prior to a signed IPE should be very rare. These purchases will primarily be to ensure an applicant's ability to participate in the process of eligibility and planning for VR Services.

1. When an applicant requires VR to purchase an item exceeding \$5,000 prior to an IPE being signed, the VRC must submit all the following information to their Branch Manager for review and approval.
 - The Branch Manager will review the request and if approved, will forward the request to the VR Business Operations Manager for review and consideration prior to the purchase being made. This request must include:
 - Participants Personal Identifier (PID); and,
 - Description of the Item needing prior approval; and
 - Three cost quotes for the equipment in question.
 - Three bids are *not* required when the purchase is:
 - Covered under a medical prescription; or,
 - Are propriety to a specific place or provider; or,
 - Are custom designed for a client; or,
 - Where not multiple options are not available.
 - **Note: Vehicle modifications still require three quotes.**
 - All client expenditures should be made under the expectation that the item being purchased is the least costly option that meets the client's needs and overcomes the barrier to employment.
 - VRC must document the reason for less than three quotes in the client case file and in the documentation submitted for approval.
 - Do NOT include personal identifying information in the information shared.
2. The VR Business Operations Manager will review each request and coordinate with the submitting branch manager as appropriate.

If approved, the VR Business Operations Manager submits the request to RSA for prior approval as required.

3. When prior approval is received in writing from RSA, the VR Business Operations Manager forwards this information to the Branch Manager and original requester.
4. Upon receiving approval from the VR Business Operations Manager, the Authorization for Purchase (AFP) may be issued.
 - The VRC must include the written approval from the VR Business Operations Manager with the file attached to the AFP.

Process for Prior Written Approval for Participant Support Costs:

1. Participant Support Costs that meet the following criteria must be approved prior to the purchase of the item.
 - Any PSC that is not included in a client's IPE:
 - PSC costing less than \$5,000, that are not included in an IPE, must be approved by the VR Business Operations Manager at a minimum.
 - PSC exceeding \$5,000 that is not included in an IPE must be approved by RSA prior to approval.
 - Any PCS that exceeds \$5,000 and included in a client's IPE must be approved by RSA.
2. The VRC should forward their request to their VR Branch Manager for review and approval. The Branch Manager will review this request and if approved, will forward the request to the VR Business Operations Manager for review and consideration prior to the purchase being made.
 - This request must include:
 - Participants Personal Identifier (PID); and,
 - Description of the Item needing prior approval; and
 - Three cost quotes for the equipment in question.
 - Three bids are *not* required when the purchase is:
 - Covered under a medical prescription; or,
 - Are propriety to a specific place or provider; or,
 - Are custom designed for a client; or,
 - Where not multiple options are not available.

- All client expenditures should be made under the expectation that the item being purchased is the least cost option that meets the client's needs and overcomes the barrier to employment.
 - The VRC must document the reason for less than three quotes in the client case file and in the documentation submitted for approval.
 - Do NOT include personal identifying information in the information shared.
3. The VR Business Operations Manager will review the request and coordinate with the requesting Branch Manager as appropriate. The VR Business Operations Manager will then approve, deny or submit the above information with any additional information to RSA for prior approval as required.
 4. When approval for this request is received from RSA, the VR Business Operations Manager forwards this information to the Branch Manager and original requester.
 5. Upon receiving approval from the VR Business Operations Manager, the Authorization for Purchase (AFP) may be issued.
 - The VRC must include the written approval from the VR Business Operations Manager with the file attached to the AFP.

Process for Prior Written Approval for Capital Expenditures:

1. The VRC must forward any client capital expenditure purchase requests to their Branch Manager for approval prior to authorizing the procurement of the item.
 - This request must include:
 - Participants Personal Identifier (PID); and,
 - Description of the Item needing prior approval; and,
 - Three cost quotes for the equipment in question.
 - Do NOT include personal identifying information in the information shared.
2. The Branch Manager will review the request for capital expenditure and if approved will forward the request to the VR Branch Manager for review and consideration.
3. The VR Business Operations Manager will review the request and coordinate with the requesting Branch Manager as appropriate. The VR Business Operations Manager will then approve, deny or submit the

above information with any additional information to RSA for prior approval as required.

4. When approval for this request is received from RSA, the VR Business Operations Manager forwards this information to the Branch Manager and original requester.
5. Upon receiving approval from the VR Business Operations Manager, the Authorization for Purchase (AFP) may be issued.
 - The VRC must include the written approval from the VR Business Operations Manager with the file attached to the AFP.

APPLICABILITY:

[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.

Oregon Accounting Manual. Accounting and Financial Reporting, Capital Assets, Depreciation and Amortization. [Number 15.60.20](#) (August 1, 2010)

Local/branch action required: NA

Central office action required: NA

Field/stakeholder review: Yes No

If yes, reviewed by: VR Executives, Branch Managers, Field and VR-SRC Policy Committee

Filing instructions: NA

If you have any questions about this policy, contact:

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