FEEDBACK - INVOICE SUBMISSION FORM

Date: 12/1/2021

ID	Comments	Response
2	The form is amazing. The creators of the form should be given raises.	-Acknowledged comment
3	The investigators have had several rate changes and it only shows the $40 rate, how would we submit the $34 and $29 for the cases that drug out way too long? What about mileage in two different years where the rates are different?	-If there are approved rates that are not listed in the Schedule of Guideline amounts there should be an NRE authorization. If this is the case or there are multiple rates, please record this in Other Services. The attached invoice must contain the detail.
4	Oh, I really like it! I've been waiting to see this. The only thing I could see is that for the extra out of pocket for mitigators and investigators you might add "gas for car rental"	-The amount should be entered in the form under Travel Expenses and supported by attaching a receipt.
5	This is simple and excellent. Is there an example of what pre-authorization for NREs will look like, or will that still be the same with an online submission requirement? Thanks!	-This form is not for requesting Non-Routine Expense Authorization. That will continue to be done with the same NRE system. We do plan to create a new NRE Authorization system. We hope to be able to do that next year.
6	looks good, please stick with this instead of the adobe type forms you make us use for NRE. Adobe is always trouble and it's expensive for small providers who only have a few cases.	-Acknowledged comment
7	Regarding the entry for "most serious case type," how does this apply to attorneys who have a mixed adult criminal, delinquency, and dependency caseload? For example, suppose I am qualified to take TPR cases but only misdemeanor criminal cases? Or what if I am qualified to take serious felonies but not only non TPR dependency cases? I think there need to be maybe an additional data entry box or perhaps boxes, for example, to address qualifications for each basic case type for which the attorney qualifies or takes cases, including dependency, delinquency, civil commitment, and adult criminal. This will also allow for possible later eligibility changes, which may become more precise. For example, in the future there may be specific qualifications regarding civil commitments and delinquency cases in addition to any adult criminal qualifications. That is, people with adult criminal qualifications may not automatically be allowed to take delinquency or civil commitment cases, which I think is logical.	-The Case and Appointment tab is required for invoices related to individual clients/cases. It is not required for those vendor or invoice types that submit for expenses for multiple clients. -This form is a summary by category of all time and expenses that are supported in the invoice and other supporting documentation that is attached for Accounts Payable purposes and is not intended for Quality Assurance.
8	Looks good!	-Acknowledged comment
9	The section for hourly rates for Investigations/Investigators needs to have the hourly rates for the two previous years as well as the current year for past years cases.	-If there are approved rates that are not listed in the Schedule of Guideline amounts there should be an NRE authorization. If this is the case please record this in Other Services. The attached invoice must contain the detail.

ID	Comments	Response
10	I filled out form with made up info and submitted it. Everything seemed to work. It did not seem to go through my regular email program, so I have no confirmation that it was actually sent. Maybe that will happen once it is "real." I suggest you make it available for real use for a couple months for beta testing before making it required.	-Acknowledged comment
11	The only choice for transcription is $3/page. Nonappellate work is paid at $4 and $5/page. Maybe that could be fixed and transcribers could be provided a confirmation e-mail when payment is pre-approved so they know which rate is being paid for the particular job they are billing for. A line should also be provided for audio conversion. Transcribers shouldn't have to do that, but often we do, and the payment we get is all over the board, like there isn't any set amount.	-This has been changed to a fillable rate box rather than a drop down.
12	For investigators, it would be great to have a spot for public record request costs (such as outside agency police reports, FTR recordings, DHS records, etc.) and a spot for medical record requests.	-Other Records has been added to the Out of Pocket Expense Summary tab.-
13	I am a mitigation specialist working mainly in capital/Mur 1 mitigation. 1. On the non-attorney form the category "Most serious case type" is confusing -- why are you asking this? I think it would be better to just state the case type MUR1 etc... for the case you are billing. 2. Appointment Date -- not sure why this is needed or what that would be? Current appointment (Jan 1, 2019?) Would it suffice to just indicate you are on contract and not have an appointment date category? 3. Travel time -- I have not been separating out my time reviewing documents/making calls etc.. from travel time but just indicate on the excel spreadsheet I submit with the invoice what is what. This is an extra bureaucratic step for us. Why is this needed? 4. Travel Expenses section -- this is very broad. no details. I'm happy to fill this out as long as you consider the travel worksheet I also submit. A broad category of Lodging expenses will exceed the NRE authorization because the one number will include taxes. As long as you are okay with this, that's fine with me. 5. Reconsideration Request -- Not sure when this is needed. Occasionally I've had trouble saving fill in PDFs and have sent them blank because I thought the info was there. When I'm alerted by staff to this, I've been providing the needed information and also resending the entire billing request. Will I now be required to fill out one of these forms? Unclear. 6. I tried to save the sample form as a PDF and most of the text did not show up. I don't know if that's because this is a trial version or not but I would want to save any submitted forms as PDFs to have a record of what I filed. Please include this capability in the form. That's it. Otherwise I think this is a good idea - assuming	1. There may be existing underlying cases and OPDS always request the most serious case type for all data collection. 2. Travel time refers to an allowable hourly service rate not expenses related to travel. 3. Please see Travel Time in the Payment Policy. Travel time refers to an allowable hourly service rate not expenses related to travel. 4. The supporting documents (Mileage and Travel worksheet) will provide the detail needed by Account Payable. 5. Subsequently withdrawn 6. -There will be a system generated email that will confirm a successful submission that will include the information entered into the form.

ID	Comments	Response
14	Not very practical. It would require the attorney or provider to fill in the entire case information every time a person would have to submit a new invoice. It does not allow you to save a copy. The categories are confusing.	-This form is a summary by category of all time and expenses that are supported in the invoice and other supporting documentation that is attached. -We will be establishing a required invoice format in the upcoming Invoicing for Payment Policy.
15	Never mind on that one point I made on the reconsideration form. I see that if you are submitting added info w/in 60 days from the notice of adjustment you are not required to fill out the form. My bad. Sorry for the confusion.	-Acknowledged comment
16	I notice there is no parenting services or assessments listed and I think those are routinely asked for in dependency cases so it might be useful to include those.	-Parenting services or assessments would be reported in Other Expert.
17	I reviewed the invoice submission form and it appears that we are supposed to fill in all that information digitally but still attach an excel/pdf invoice? Or an NRE? So, what I am seeing is a lengthy form to fill in plus still using the archaic spreadsheet and/or NRE as an attachment also? What I was hoping to see is a place where we can add the services/fees traditionally on the spreadsheet (invoice) in order to stop using them and to stop having AP have many different types of invoices to review. The federal system allows for adding dates/service description/rate/amount and you click add and it generates a spreadsheet-like section. This is still a lot of cumbersome steps, IMO. I keep my hours in a document in my phone (since I am often on the road) then I move it into a spreadsheet, fill out an NRE, and make them into a single pdf. It takes me hours to bill when I am doing multiple cases at once and those hours aren't compensated. I think this is a good start, but I think we should be able to enter per day what services we provided, the time it took to perform the service(s), and the amount and have all of it logged in the same place. Attachments should only be receipts, etc. Like the federal system, our NRE's should all be digitally accessible from our log-in and we should be allowed to bill against the NRE (feds call them vouchers). If we are moving away from email it doesn't make sense that attorneys request hours via email, OPDS approves hours, sends NRE's to attorney via email and then attorney sends them to other providers via email. The system really ought to be all encompassing. We can interim bill in the federal system also and continue to use the same NRE until it's exhausted. This is less work for those processing payments and the attorneys who have to request the authorizations for hours/travel. I don't know how this system is more cohesive or simplified than what we are doing which I think was the goal.	-This electronic form replaces the Fee Statement currently required to submit invoices and we hope that moving to an electronic format with rates and calculations will benefit our partners. -This form is a summary by category of all time and expenses that are supported in the invoice and other supporting documentation that is attached. Time detail should be on the invoice. -We will be establishing a invoice format in the upcoming Invoicing for Payment Policy.
18	Under "Other Services" there is no entry for forensic services. IE: Digital, medical review, accident reconstructionist. Unless these fall under "Other Expert" In Case Appointment and Information: Will full name be required or just last of client? Will hyphenated names be a problem? Is this survey being presented to all Oregon providers?	-Forensic services should be recorded in Other Expert. Minimally the last name of the client, but both first and last can be entered. -Hyphenated names will not be an issue. -A notice regarding this opportunity to provide feedback was sent to all who are on our notification list and it was accessible to everyone via our website.

ID	Comments	Response
19	As well designed this form is, it seemingly **requires field by field hand re-entering** all the same information (Names/OSB/email/case info, etc.) every time into a blank form for pay as you go billers and does not allow any type of automation or transfer from my local databases directly into the form. Please provide a method to allow me to one-time design and configure my system to allow inputting data from my local system which I can pre-configure to collect, pre-configure to categorize expenses per your form's requirements from my automated case management time keeping system. I will be pleased to modify my system to conform to classify and input data per your form, but **there must be a way to then bulk transfer pre-configured data from my external system into your form without having to hand enter every single field. I can be responsible for pre-formatting my data to fit your form by any method that allows automated filling in of your form.** I can easily write code or macros to export and adapt to any format/method such as a conforming .csv file or .mdb or anything else on earth that I (and others) can design to work to fill in your form. I am hoping that perhaps this has already occurred to your folks and the capability exists to automate filling in your .html /.xml code and I simply need to be provided with a guide to the required fields, syntax, and formatting. Thank you,	-This electronic form replaces the Fee Statement currently required to submit invoices and we hope that moving to an electronic format with rates and calculations will benefit our partners.
20	I'm really glad OPDS is doing this. If the goal is to streamline accessibility and make it possible for OPDS to process requests digitally, then it seems like the vendor number/EIN should be accessible by looking up the last name or business name in the OPDS database. Similarly, I appreciate the ability to have attachments explaining justifications, but wouldn't it also be a good idea for a brief comment box where I can just write the two paragraphs I need to explain why I need a psychologist for my felony client who is unable to aid and assist?	-We are unable to add auto populate to the form but your browser may retain information previously used. -This form is a summary by category of all time and expenses that are supported in the invoice and other supporting documentation that is attached. -This form is not for requesting Non-Routine Expense Authorization. That will continue to be done with the same NRE system. We do plan to create a new NRE Authorization system. We hope to be able to do that next year.
21	The form does not include rates for criminal appellate panel cases, which are currently based on case & brief type and transcript length (at least mine are).	A line item with a drop down for appellate counsel rates has been added.
22	Amend OSB # to OSB/DPSST#? Would it be possible to link authorizations for investigators/paralegals/etc. to the form? Then, if we input the authorization number all the information can auto-populate?	-The OSB number will be used for validation and is in our database. We do not currently keep DPSST numbers in our database. This is a good suggestion and we will look at adding it in the future. -This information is in a separate database at this time and cannot be accessed.

ID	Comments	Response
23	Invoice type is unclear. I am representing two individuals and getting paid directly by OPDS but I have no contract to do so. Also how do I submit both my time and my routine expenses as only one can be checked. Appears this will require more time at my end but if the overall effect is to require less time at your end it is ok. But why is OPDS again shifting costs to providers without funding them?	-Please see the Invoice Submission Form Procedure on our website. The procedure lists invoice types and their intended application. -The time would be put into the Counsel Fees and Expenses Summary tab, out of pocket expenses would be put in the Out of Pocket Expenses Summary tab. -This electronic form replaces the Fee Statement currently required to submit invoices and we hope that moving to an electronic format with rates and calculations will benefit our partners.
24	I think the form looks great. Will we be submitting actual timesheets? If so, I think we also need a timesheet form so that all invoices sent to accounts payable look the same. That hopefully would make payment easier and quicker for you guys. Thank you	-This form is a summary by category of all time and expenses that are supported in the invoice and other supporting documentation that is attached. Time detail should be on the invoice. -We will be establishing a required invoice format in the upcoming Invoicing for Payment Policy.
25	I'm not sure if this will be easier or not on my end as an investigator, but if it means that I can get paid in any consistent manner, its worth it. I would recommend ditching the dropdowns on line items that only have one cost. For example, black and white copies doesn't need to have a drop down to select the only possible price. This will help speed up entering multiple invoices for processing. The other option would be switching to a general "out of pocket, non-attorney" line item where we can put all of that on to one line as we have on our current authorizations.	-Drop downs contain rates included in the Schedule of Guideline Amounts
26	I really like the form. My only suggestion is in the Travel Time portion. There should be a box for number of hours rather than just a total for "Amount billed" so that the hours will show for Travel Time. The rest seemed pretty self explanatory.	-Box for the number of hours Traveled added.
27	I'm an investigator. One comment for the "Other Expense" section, having a 'records cost' category would be helpful for medical records or things that fall outside of circuit court records.	-Other Records has been added to the Other Expense Summary tab.
28	I think this form looks really good. I think it odd that in the "other services" category there is a separate place for travel time, where one selects the category but no box for the actual amount of travel time. Also, there should be a mileage box in this same category. Or are we to use the one down in travel expenses? maybe that is what you intended. Also, I have never had to send in more than 10 scans of documents but it seems like a remote possibility, could you make the limit on how many can be attached a little higher? maybe 20? Anyway, I say good job overall.	-Hours box added. -Mileage is a Travel Expense which is included in that section

ID	Comments	Response
29	I would like to be able to submit interim billing while a case remains open. That would negate the need for multiple 10 or 20 hour expense authorizations.(I am an investigator) One order for 40-50 hours would suffice and allow for more regular billings and give vendors an ability to maintain a more regular cash flow. As you know, cases can sometimes take years to completely resolve ,a situation that has been exacerbated by Covid. Interim billing would address that. Note: The Federal court appointments allow for interim billing and use a form very similar to the one proposed here.	-Acknowledged comment
30	It would be great if we could auto fill our personal information, name, email, vendor number, etc... Just a thought. Also, shouldn't there be a mileage option for investigators? I like this form otherwise. Does this mean that we will get paid on a regular basis? like, if we send in our bill by a certain day of the month, then we would be guaranteed payment by such and such date of the next month? Invoice (time card) submitted by the 15th, paycheck by the 5th? It seems like it would be easier for all, you and us, if we submitted our electronic invoices and there would be only one pay day for everything submitted by a certain date. Any how. Thank you. I do like the form, and I bet this is better than trying to read all the different styles of handwriting on the current invoice sheets.	-We are unable to add auto populate to the form but your browser may retain information previously used. -This form is a summary by category of all time and expenses that are supported in the invoice and other supporting documentation that is attached. -This form is not for requesting Non-Routine Expense Authorization. That will continue to be done with the same NRE system. We do plan to create a new NRE Authorization system. We hope to be able to do that next year. -We will be establishing a invoice format in the upcoming Invoicing for Payment Policy.
31	I don't like the new form. I prefer the old one. By a significant margin.	-Acknowledged comment
32	In the 'other services' area, are we supposed to add atty time for requests for authorizations (NRE), or how much time we deal with that aspect of the case? If the later is what you want, that will take a lot of time to pull out. I'm concerned either way - it will look like duplicate time from the regular hours reported. If OPDS' goal is to break down what TYPE of time is required on a case, this would better be handled by a billing form that lets OPDS isolate time by entry type - meaning a standardized billing menu. Attorney time on a complex matter just isn't a 'one size fits all'. Any attorney who routinely bills hourly understands that the explanation potion of the time is always going to be necessary, and frankly, attorneys should ALWAYS document what they do, not only for payment/accounting, but for PLF purposes.	-This form is a summary by category of all time and expenses that are supported in the invoice and other supporting documentation that is attached. -This form is not for requesting Non-Routine Expense Authorization. That will continue to be done with the same NRE system. We do plan to create a new NRE Authorization system. We hope to be able to do that next year.
33	In the future, if at all possible, maybe link the authorization number to provider information such that entering the authorization number auto-populates the provider info. It looks great. Really appreciate your efforts on this.	-This information is in a separate database at this time and cannot be accessed.

ID	Comments	Response
34	I think this is a good first step, but this appears to only replace the current paper version of the Accounts Payable Invoice Submission form. I would strongly encourage OPDS to get to a place where activity can also be submitted electronically. Thank you.	-It is our hope that it is an interim step to move to an electronic form from the PDF versions we currently have while continuing to strive to obtain the funding necessary to improve our IT systems.
35	the meal pull down should go into subsets which specify which meals B,L and D and the cost per	-The form is a summary, the detail should be included on the invoice.
36	The form is confusing and would require the provider to re-enter all of the case information every time a new bill is submitted. Bad idea.	-This electronic form replaces the Fee Statement currently required to submit invoices and we hope that moving to an electronic format with rates and calculations will benefit our partners.
37	Hello, I was wondering what protocol might look like for entering hours when the rates for your case have changed over the course of the case? For example: I have several older cases where I was initially retained at 34 an hour as an investigator. The client then went into warrant status for quite some time before resurfacing(or in some cases did a lengthy stint at the State hospital on aid and assist) and now that the case is active again, the new rate for my current work is at 40 an hour. How would I enter that? Also would we be needing to also fill out an NRE and attach that in addition to attaching a self generated invoice? Thanks!	-If there are approved rates that are not listed in the Schedule of Guideline amounts there should be an NRE authorization. If this is the case or there are multiple rates, please record this in Other Services. The attached invoice must contain the detail as well as attaching the NRE authorization.
38	Huge improvement! Will there be a printable confirmation and download process after the submission or will it come from an A/P mailbox? Will there be a tool to view all outstanding invoices? Regarding the "Case & Appointment Information" section, shouldn't the case-specific fields auto populate once an NRE number is entered? Thank you for this great enhancement!	-Yes there will be a confirmation email sent when the invoice is accepted in to the system as well as other notices should clarification be needed and a notice when the invoice is transferred to DAS for payment. -There will be no list of outstanding invoices at this time. -We are unable to auto populate at this time.
39	This is going to be incredibly cumbersome unless there is some form of login that will enable us to save our prior entries - having to re-enter my EIN and bar number for every bill is annoying. Same with case numbers/clients. There are so many aspects of the bill/invoice that will be exactly the same for months on end that it seems ridiculous to not have a mechanism through cookies or a login or something that can identify us and our information.	-We are unable to add auto populate to the form but your browser may retain information previously used.

ID	Comments	Response
40	Hi, You have now gone too far with this form and it does not make sense to use this form to get paid. To get paid now, we have to submit either a bill for Attorney fees or the filled out Authorization for sub providers. Of course both of these have to be submitted with proof of what was spent or time that it took and payment information (cancelled check). The same needs to be submitted with the one form. You can get the same information by not totally changing the way for the umpteenth time how we and others get paid by OPDS. When this form does not work out, there will be another change. This form does not have anyplace to put in the exceptions. While you may not want exceptions, we know that there will always be exceptions and you have not kept any way to indicate the exceptions. For example, payment of paralegals (and the same applies to the attorney fees) have drop downs for a rate or different rates but again for example, I and others have been authorized to pay paralegals more than the $15 that is the only drop down rate. So how does this person or how do I get reimbursed when we have been authorized at a different rate? Really. The best thing to do is to have two forms like you have now and have them have not only set drop down rates but a way to put in the actual authorized rate when it is different than the drop down rate that you have set out. **The sub provider form should just be a modification of the current authorization form that is currently set out. You can put dropdowns in that form and the information authorization information will already be included like it is now. Makes it efficient for the provider to get paid, and provides you the information in a way that can be put on whatever system you are using to collect this information without your and our employees or us having to type everything multiple times.** **The attorney bill should be what you currently have which has all of the information in it and can be reused from month to month without having to fill in all of the case specific details over and over again. Makes it efficient for the attorney to bill, etc. etc.** The easiest thing that you could do is again have two different forms like I have stated above that we can use over and over again without having also to fill in the case information every time we need to get reimbursed. Make it easier for all involved not just OPDS's if this form even does that, which I doubt. Redo the thinking on this form and this issue.	-The form is to be completed by whomever is submitting an invoice for payment. -Counsel will only complete the sections of the form applicable to their invoice. -If counsel has requested an NRE it is the service provider who will submit their invoice and the approved NRE, not counsel. The NRE authorization process is separate. -There are options for counsel to enter for the total number of hours at the guideline rates with a drop down of those rates and another for rates approved by General Counsel or the Contract Analyst. -The form has been updated to enter the rate approved on the NRE rather than a drop down.
41	Since we will be entering a vendor number, could that number auto populate the individual or business name?	-We are unable to add auto populate to the form but your browser may retain information previously used.

ID	Comments	Response
42	Please add a category for postage. Investigators often need to mail large packets of records/documents to clients who are in custody. Postage for large manilla folders has to be purchased at the post office, and certified mail also must be purchased at the post office. Please add a category for public records requests that are not court certified copies/transcripts. Often times investigators will need to submit requests to multiple agencies to inquire about involved parties.	-Postage/Shipping Expenses has been added to Out of Pocket Expenses Summary tab -Records (Medical, DMV, etc.) has been added to Out of Pocket Expenses Summary tab
43	Are we expected to "Attach" our billing to this 1 page bill? This is not going to be sufficient to complete the amount of pages for my juvenile work as my billings are long and lots of pages. How are you going to accommodate this? I am sorry but I don't usually listen to the monthly meeting since they rarely mention anyone EXCEPT THE CONTRACTORS. Since OPDS only cares about the contractors and not the hourly billers, I am not going to waste my time with these meetings. I guess I will have to figure it out when January roles around.	-There can be multiple attachments and each attachment can be multiple pages. We have anticipated large file sizes and the system can accept up to 10 files, with each file 15mb max size. -Accepted document types are: doc/docx, gif, jpg/jpeg, pdf, png, rtf, tiff, txt, xls/xlsx
44	It would be great to have an example or template of what the attached invoice should look like for Case Managers. I don't believe we have ever had an example to follow and it would be ideal to have one to avoid delays in payment for our case manager providers.	-We will be establishing a invoice format in the upcoming Invoicing for Payment Policy.
45	The form is still somewhat confusing and will result in more time spent on billings that we cannot be compensated for. Questions - 1. Will we still have to fill out PUBLIC DEFENSE PROVIDER'S FEE STATEMENT FOR ATTORNEY FEES AND ROUTINE EXPENSES? 2. Will we still need to do a cover letter detailing hours previously billed and a summary of the case?. 3. Or will we only need to submit a timesheet detailing time worked and expenses occurred along with receipts? OPDS needs to provide instructions with this form since it is not intuitive.	1. This electronic form replaces the Fee Statement currently required to submit invoices and we hope that moving to an electronic format with rates and calculations will benefit our partners. 2. A "cover letter" is not required. The invoice should have the detail for the current billing and any other information required in policy for payment. This form is a summary of the fees and expenses detailed on the invoice and other supporting receipts and documentation. 3. See number 2 OPDS will provide written instructions as well as a how to video.
46	Just noticed on the alert for "County" on Vendor Information does not have a flag when left empty. All other fields alerted user to the field being empty with a flag.	The flag has been added.

ID	Comments	Response
47	Thank you in advance, and I tried to at least mention each of the areas that seem like they could complicate the process, so this became a little longer than I intended, but if any of the comments help somehow, great! I am a private investigator, so my comments come from that perspective and hoping this will help us and OPDS not have to spend so much time on billing. I thought that the goal of this new format was to act as our invoices and fee statements. It would be great if there were a way to do that someday, so it's all one form with out having to create separate invoices each time (I have thought of ways how, but does not seem that is the goal of this round, so I will stick to this - ask for a mock up if you are ever curious :) I would happily share). Section 1: Where the authorization number is requested, once this is entered, if it and the last name match, it would be ideal for some of the form to disappear except the sections that could possibly apply. The form asking the invoice type is something that investigators don't have to deal much with. There is no option on the drop down that says investigation either. Again, if when the authorization number is typed in, some data can prepopulate, since there has to be some sort of database for all of the approvals that are sent out, it seems this would help eliminate a lot of human error possibility. This would help populate the county name and show the date that the authorization says you can work from, but not before. Section 2: Does not apply to me, but again, this is where it would be really helpful for once the authorization is entered, it could eliminate the irrelevant sections. There are many irrelevant sections for a lot of us who would be submitting invoices. OR before even getting into this form, could there be a couple versions? The start page have maybe 3-5 options? Attorney Investigator Expert Transcription Interpreter (and whatever other categories could apply?) Once you pick which applies to you, it only has the relevant section? This also could help filter what type of invoice is being submitted so the forms go directly to the right unit? Just thinking out loud. Section 3: Applies to me but would be unnecessary if things prepopulated. Some of these questions will require more work to do our billing than current or people will simply not fill them all in or guess. For instance, appointment date? Is that when the attorney got appointed or the day that the attorney applied for me to have hours for the first time? I would have to go look up either every time I went to do my billing. This would be a very irksome thing since much of this feels as though it really only applies to the attorneys. Section 4:	Section 1: This section is required for all submissions. The form is broken into tabs that are collapsed unless selected. The submitter can select only those tabs that contain fee and/or expense types on the attached invoice. All investigation would have pre-authorization and would be a Non-Routine Expense invoice type. The reason for other specific Non-Routine invoice types is that there are different requirements. This submittal form does not integrate with the Non-Routine Expense authorization database. Section 2: This section is only required for Routine - Appellate Panel invoice types. Section 3: Appointment date is only required for the Counsel vendor type. Section 4: See Section 1 response Section 5: Travel time is included in the overall number of hours approved in the NRE authorization and would not be billed as separate time. Section 6: The rate in the drop down is from the Schedule of Guideline Amounts. Section 7: If submitting multiple years of mileage expenses, use the mileage line item for the most recent year and the Travel Expense line item for the balance of mileage. The detail must be attached on a Mileage and Travel Expense Worksheet.

	Not applicable to me, please see section 2 comments. Section 5: Is investigation time only when I am actively investigating or does this include my drive time? If these are separate, please better verbiage to add clarity - I have received different answers on this over the last couple of years as is. I currently guess and hope I am right - not something I like to do when a little more wording would solve this. Section 6: Love it! I print a lot of discovery to review with clients and this is such a great and easy way to do this, but is it possible somehow trigger it to give more lines for any of the dropdowns? Example. I had black and white prints ran a few times in one invoice cycle, but because I get a bulk rate that differs depending on how many pages per project, my cost per page can differ each time. Is there a way to make that work in this form? Also, it is not uncommon for me to request records and have to pay for them. Is there a way to add section for total paid out for records please? Section 7: Straight forward enough, I think. If our hours are split between two years, can you please have a way to have two sets of mileage lines so that we can separate since different years have different rates? This might be something to consider also if the rates change for hourly. Section 8: Looks easy enough! If any of this does not make sense, please feel free to reach out and ask. I love what you are trying to do, but this version feels a bit clunky as is. Hope I can help make it a little easier for everyone	

ID	Comments	Response
48	It works!!! I don't like that I will have to enter my information and my client's every time but I can live with that.	-Acknowledged Comment-
49	I assume the authorizations and the actual invoice will remain the same and this for is in addition	-This electronic form replaces the Fee Statement currently required to submit invoices and we hope that moving to an electronic format with rates and calculations will benefit our partners.
50	This is confusing, onerous and a triplication of work we already do. It appears that we will be required to (a) complete our usual invoice, with receipts; (b) fill out the NRE and then (c) fill out this form which is a triplication of information already provided in the NRE and on the invoice. I think the system should be a direct billing system like the federal system, it will cut down on paperwork and the system is direct to your agency. They are a model, I am sure you could ask them to see how their system works. It was our understanding the legislature is requiring a streamlining of the system.	-This electronic form replaces the Fee Statement currently required to submit invoices and we hope that moving to an electronic format with rates and calculations will benefit our partners. -This form is not for requesting Non-Routine Expense Authorization. That will continue to be done with the same NRE system. We do plan to create a new NRE Authorization system. We hope to be able to do that next year. -The form is to be completed by whomever is submitting an invoice for payment. That submitter will only complete the sections of the form applicable to their invoice.
51	As far as the transcript process, will the transcriber just attach there Certificate of Service and the actual transcripts to this form. If so is there a size limit. Some transcripts can be 5,000 pages?	-Yes, the invoice, Certificate of Service and transcripts will be attached to this form. We have anticipated large file sizes and the system can accept up to 10 files, with each file 15mb max size.
52	On the invoice where you can input the amount for transcripts, the only choices in the drop-down menu (in the example anyway) is $3/$5/$6 -- the range that I am usually authorized is $3.00/$3.25/$3.50/$4.00. I would love it if I was authorized $5 or $6, but there should be an option to either type in a different amount or have those various amounts in the drop-down menu. The form looks great!	The drop down has been replaced with a data entry field to enter the rate.
53	The number of transcript pages is currently part of the calculation for the appellate panel attorney rate; I don't see an entry for this on the appellate billing page.	-Counsel - Appellate Fees has been added to the Counsel Fees and Expenses Summary tab.
54	Is this for investigators also?	-This form will be required for all invoice submissions. This electronic form replaces the Fee Statement currently required to submit invoices and we hope that moving to an electronic format with rates and calculations will benefit our partners.

ID	Comments	Response
55	Also what is a vendor number	-The vendor number is the number assigned to a specific vendor by DAS in order to receive payments.
56	As I work on preparing a bill that covers two years realized there is a travel mileage issue on it and also with your new form. Both only allow entry of mileage at one rate although the rate frequently changes at the start of each year. Given the number of cases that will cross year ends there should be two mileage entries available.	If submitting multiple years of mileage expenses, use the mileage line item for the most recent year and the Travel Expense line item for the balance of mileage. The detail must be attached on a Mileage and Travel Expense Worksheet.
57	1. It seems crazy that an investigator on a simple case should have to respond to 8 PAGES of questions. Poor design! Impractical design! Too much unnecessary red tape/bureaucratic fluffery. Clearly, written by bureaucrats and not working people. 2. On the final page, investigators like me are asked to attach information. I presume this is our regular detailed invoice? Why is this not more clear? Why is there not an easy button to push to copy and send the detailed invoice? Why is there absolutely no clarity on this? 3. The way we include our detailed invoices should absolutely be explained, and made easy as pie. 4. All and all, far too much bureaucracy and almost no practicality! Needs significant revision by a practical person.	1. This electronic form replaces the Fee Statement currently required to submit invoices and we hope that moving to an electronic format with rates and calculations will benefit our partners. The form is to be completed by whomever is submitting an invoice for payment. That submitter will only complete the sections of the form applicable to their invoice. 2. This form is a summary and the detailed invoice must be attached for payment. 3. The invoice can be dragged into the box or click on select files and you can search on your computer to select the file to attach. -OPDS will be providing written instruction as well as a training video.
58	This is way beyond a billing system. It seems more like a data tracking system. We still have to attach an invoice after filling out this form? I thought it was going to be more like the federal system in which you enter your date, time, task at the applicable rate and the system computes the billable hours, travel, and expenses. Does not seem user friendly.	-This electronic form replaces the Fee Statement currently required to submit invoices and we hope that moving to an electronic format with rates and calculations will benefit our partners.
59	How does a person keep a complete copy of what they've submitted? Really hate having to complete the same info for continuing cases in which I invoice several times. Very time intensive on my side. Really hate these sorts of web forms that I have to continue to click through to get to the next part.	There will be a system generated email that will confirm a successful submission that will include the information entered into the form.

ID	Comments	Response
60	1st suggestion: All of these comments submitted to OPDS be shared with all OPDS Vendors that will be required to use this new billing method, whether anonymous or not. Post it on your web site so that all Vendors have access. Your email system to all Vendors does not work for communication to all Vendors. Be transparent PLEASE! 2nd suggestion: for photos, on the new online method, specify "Photo Paper usage required" on color photographs. I think some people don't realize it is required to use Photo Paper to get the higher amt for color photos. And consider increasing for color photos that we print on our own business printers. I pay over $100 for cartridges; it is not worth me printing them at my place of business therefore I go to a print shop where it is much more expensive for taxpayers (OPDS reimbursement). Go back to what you used to reimburse ($1.00 per color page). Pay equal to what the print shops charge would be quite fair!! 3rd suggestion: it appears to me this new billing method will take considerably more time than the current paper NRE. We receive NO payment for Billing Time. OPDS does not seem to understand the frustration of this, and adds more time consuming methods, instead of trying to SIMPLIFY the current system. All these web pages I will have to navigate through, just adds time to my day/night/weekends that I have to work that I don't get paid for!!!!! 4th suggestion: I notice you are going to require us to separate Travel Time from Other Time. This is VERY time consuming, as separating Travel Time on my Invoice will be required (not currently required). I FEEL STRONGLY THIS SHOULD BE ELIMINATED. Again, we receive NO payment for Billing Time. This will just be another time consuming task that I have to complete/separate to get paid. **THIS IS NOT A REQUIREMENT CURRENTLY AND SHOULD NOT BE A NEW REQUIREMENT!!!!!** If OPDS has concerns about any Vendor not reporting correct time, in any way, they should be contacting the Vendor individually, not punishing other Vendors by having this additional tracking. If OPDS wants to know how much travel time we are spending, **then have your Accounts Payable Billers figure it up.** We are required to put down "From City" and "To City". **So OPDS Accounts Payable billers can take the time to figure out the Travel Time spent on each case, if it is important to OPDS (at least the OPDS Billers would get paid to do so).** 5th suggestion: When the new Interim Director of OPDS started, some how he was able to get Accounts Payable to pay at about 20 working days (this is not counting the day of submission, and the last day counted is the day funds go into my bank account). At one time, it only took Accounts Payable 10 working days. Currently it is near 30 working days....again (and it has been much worse). So, whatever was working at 20 working days isn't working no more. Please revisit what does work! Before this new procedure is implemented, I hope that OPDS will try to foresee issues, and allow Vendors to use the "old" method if needed until OPDS gets any kinks worked out. I hope OPDS will WAIT until you are caught up with your billings (back to every 20 working days or better) before you implement this new system. Otherwise, I believe there will be consider delays in payment. Our creditors we have to pay are not understanding because we never know when we	Suggestion 1: All comments and responses will be published in an FAQ Suggestion 2: The rates in the drop down are contained in the Schedule of Guideline Amounts. Suggestion 3: This electronic form replaces the Fee Statement currently required to submit invoices and we hope that moving to an electronic format with rates and calculations will benefit our partners. Suggestion 4: Travel time is only reimbursable per policy and is not applicable to all invoice types and has specific guidelines. If it is an allowable expense we need to see it separately. Suggestion 5: It is our hope that the move to an electronic form from the PDF versions we currently have will help improve our processing time and reporting capability as we continue to strive to obtain the funding necessary to improve our IT systems.

	might be paid by OPDS. My personal feeling is OPDS does not care about their vendors because of the way I am treated/preached to whenever I have an issue. This is our livelihood working self employed ---sometimes day and night to get the job done. If you only knew how much time we "donate" to our cases because we don't want to bother an attorney with asking for one more NRE to cover all the hours. Or how easy it is to go over hours before you know it because we are working such long hours to get all the work done in these tough times. I don't think OPDS considers things like how much more time it will take for each case to separate the travel time with other hours. I'm not an accountant. I'm not an accounts payable biller. I am submitting my invoice to OPDS and this will still be required however, now I have to fill out for a second time all the web pages-----VERY TIME CONSUMING and nope, I don't like it. Please, please consider any/all comments. Thank you for your time, and asking for input.	

ID	Comments	Response
61	travel time should go under travel expenses not other services	-Travel time refers to an allowable hourly service rate not expenses related to travel.
62	I don't have any comments on the form per se (it's hard to know without using it), but I noticed that the only category that is paid $105 is "capital," and I think it's pretty clear by now that that will be about zero cases, state-wide. If you pay less than $105 (the other option is $75), you will lose experienced counsel. As I assume you know, the CJA rate is over twice $75, and many of us are able to bill at $200-$300, and up, an hour. I don't mind being asked to describe, by .1 of an hour, what I did -- I've been doing that all my career for retained and CJA work. I would welcome a part-time contract, at $105 (as I've had for years before OPDS stopped the capital contracts).	-The rates in the drop down are contained in the Schedule of Guideline Amounts. There is another line item available for rates approved by General Counsel or Contract Analyst. -We are currently reviewing the Schedule of Guideline Amounts for updates.
63	I think we may want to require a certain number of digits in the "vendor number" field at the top of the online submission form. I know it requires a vendor number, but it doesn't seem to require a certain format (that I can tell). Currently a significant amount of providers only fill in their tax ID number on a lot of their fee statements. We have been accommodating that and we add the numbers at the back and the front to make it work for us, since they listed that, but I am wondering if this is a good time to make it so that it requires the full thing including mail code, which would be 13 digits total. It would mean a LOT of people confused and asking us what their vendor number is, but after dealing with that initially wave, then it would make it uniform going forward. I don't know if that would also be helpful for when reports are run or data is gathered in the future. If things are not in a uniform format, it might cause other issues with tracking.	-The vendor number field now has a mask that will require the right amount of digits and will be formatted.
65	As we are a consortium, and have multiple attorneys, when submitting mileage for the entire consortium, do I continue to submit it as a whole? Or individually for each of my attorneys?	-Select the Administrator vendor type and Routine - Contract invoice type.
66	The Form is too long. But whatever OPDS/PDSC needs to get us paid in a timely manner……	-Acknowledged Comment
67	It's too long and I need to be able to print out and save a hard copy of what I submitted. I don't see that being possible, when I tried to print out the form by printing page it didn't print everything. Maybe if the form is as attachment to my email like the NRE's are then I would be able to save and print out what I completed and submitted, that would be helpful.	-There will be a system generated email that will confirm a successful submission that will include the information entered into the form.

ID	Comments	Response
68	**Suggestions/Comments:** The mileage being on a separate travel expenses summary tab is slightly confusing when going through and filling out the information. Would be nice if it was on the same tab as the other "non-routine" expenses. However, it is not a huge issue, and would not take long to get accustomed too. **Questions:** Assuming this is going to replace us having to complete the NRE form that we are currently required to submit with our invoices? Or will we still have to complete those and submit them with the invoice at the end where we submit our files? Will there be an option for batch filing for multiple cases at some point as well?	-This electronic form replaces the Fee Statement currently required to submit invoices and we hope that moving to an electronic format with rates and calculations will benefit our partners. -This form is a summary by category of all time and expenses that are supported in the invoice and other supporting documentation that is attached. -This form is not for requesting Non-Routine Expense Authorization. That will continue to be done with the same NRE system. We do plan to create a new NRE Authorization system. We hope to be able to do that next year.
69	I would appreciate an information document emailed to partners prior to the implementation, explaining how the process will work. This might also be a good opportunity to announce any changes in rules, fees, rates, etc.	-OPDS will provide written instructions as well as a how to video.
70	My Suggestions/ Comments are: have separate online forms for attorneys and others....and simplify it more if possible!!!!!! And, are we going to have to report travel time separate now? This is something new and makes billing time longer. It looks like to me that this online process is going to take consider more time for me then filling out the paper NRE. This is not something I was hoping for. I was hoping OPDS would streamline the billing process to make it less!!!!! It is already a pain each time I bill. What's up with that? The new way may benefit OPDS in that maybe you can lay off some of your Billers but it sure doesn't benefit us!! Also, I noticed on per hour that there sure is a discrepancies in a couple of "titles". Investigators, Capital Investigators, Mitigators, and Case Management are all investigators yet they are all paid quite differently. Why? Most regular PI's working misdemeanors up to non-capital cases get paid $40.00 hr. Capital case investigators $45.00 (I'm surprised you get investigators to work these cases for only $5 more an hour). Mitigators get $65 an hour!!! Why? They interview and fact find and write reports just like any investigator. Why such a difference in pay? Even case managers (investigators) get eighty cents more an hour than a regular investigator. Why? I hope the new Director will take the time to answer all the questions & feedback, and share with all of us who do business with OPDS. We have taken the time to respond to this Feedback, so please respond in kind. Thanks.	-This electronic form replaces the Fee Statement currently required to submit invoices and we hope that moving to an electronic format with rates and calculations will benefit our partners. -Travel time is only reimbursable per policy and is not applicable to all invoice types and has specific guidelines. If it is an allowable expense we need to see it separately. -We are currently reviewing the Schedule of Guideline Amounts for updates. -OPDS is publishing FAQ, written procedures and will have a training video available.

ID	Comments	Response
71	Will Interpreter Providers be submitting invoices directly online to OPDS using the **Other Services Summary** tab or are they submitting an invoice to Counsel who then submits to OPDS as part of Counsel's submission? If the former is the case, will Interpreters perform a separate Invoice Submission per individual defendant/case? This would differ greatly from the current Atty-Client Communication Worksheet model used allowing for multiple defendants/cases per each Worksheet and multiple Worksheets per one Fee Statement Summary. Or, will the new online invoice submission form make the Atty-Client Communication Worksheet obsolete, eliminating the need to get attorney signatures on the Worksheets? In the *Attachment Files* box of the **Grand Total and Attachments** tab, will Interpreters be uploading the currently used and aforementioned Atty-Client Communication Worksheets allowing for multiple defendants/cases on one Worksheet and multiple Worksheets per Fee Statement Summary? Or, will Interpreters be uploading their own Invoice per case/defendant? <u>**Note**: Invoicing per case/defendant will GREATLY increase the time an Interpreter Provider spends invoicing OPDS.</u> **Case and Appointment Information.** Will a case type need to be selected per case. OPDS will need to educate the interpreters on Case Types, *Most Serious Case Types*. *Appointment Dates*. Interpreters have had little concern for Appointment Dates. Education will be necessary and access to Odyssey will be an issue, since most interpreters have no access to Odyssey. **Other Services Summary.** How is Travel Time calculated for Interpreters vs. Mitigation vs. Psychiatric vs. Investigation vs. Other Expert. The Travel Time line item has these 5 Options as a Category. What are the rates for these, and are Interpreters the only Providers who get paid at half rate for their Travel Time? **Other Expenses Summary** and **Travel Expenses Summary.** Can interpreters bill for Parking as a Travel Expense and Photocopies made of the Discovery? Thank you!	-Interpreters will select the Routine Interpretation or Translation or Discovery Invoice type or Non-Routine Interpreter or Translation. Routine Interpretation or Translation or Discovery invoice type does not require that the Case and Appointment tab be completed because of multiple clients per invoice. -Required approval of counsel will be accepted via a copy of an email from counsel noting client and date of services or signature on invoice or worksheet. -Travel time is only reimbursable per policy and is not applicable to all invoice types and has specific guidelines. If it is an allowable expense we need to see it separately. -Please direct policy questions to accountspayable@opds.state.or.us
72	This new form is so complicated. Are you going to teach us how to fill it out? Just when I think this job can't get any more stressful. Thanks, Katie Bradford, Court Reporter	-OPDS is publishing FAQ, written procedures and will have a training video available.

<table>
<tr><th>ID</th><th>Comments</th><th>Response</th></tr>
<tr><td>73</td><td>Thank you for this opportunity to speak.
(I tested out the form and submitted this feedback as an attachment to that however, wanted to make sure that I shared the feedback here as well.)

We are an agency and have multiple investigators, multiple attorneys, multiple counties and multiple clients. As our agency has grown over the past 4 years, I had to simplify invoicing. I created a spreadsheet with formulas to help simplify our processing, however sometimes, I've missed changing the rates (hourly rates, yearly mileage variances). There have been times where something shifts in the AP department and suddenly, we start receiving rejections/adjustments on processes that have been accepted for a long time…without any notice. Now, I've made mistakes a long the way but having to redo work because of a change that we were not notified about…..that was extremely frustrating, time consuming and costly.

With no training for Investigators and no system to use for submitting, it has been a challenge. I know that we have lost funds along with way due to lack of understanding the process and leaving the responsibility on us to teach ourselves. Even more so, when an attorney asks our investigators to do something, then the state refuses to reimburse us for the charges, we have to eat the cost.
For example:
1. A murder case involving car accident, attorney ask for the $40 Car Fax, but we were denied reimbursement.
2. Client has to pass a covid test in order to get approved for housing, but jail will not have him tested. Attorney asks us to purchase the $109 test, but we are denied reimbursement.

I'm excited to see the final process in place.
Again – thank you!

<u>Feedback on from the FORM:</u>
1. VENDOR INFORMATION:
The NRE format needs to be text vs numerical so the comma will not appear.
2. APPELLATE PANEL
As Investigators, do we just bypass this segment?
3. CASE AND APPOINTMENT INFORMATION
What is the Appointment Date? Court dates change a lot so I'm assuming it's not the court date.
4. COUNSEL FEES and EXPENSES SUMMARY – nonapplicable to Investigators???
5. OTHER SERVICES SUMMARY
a. We conduct Case Management and Mitigation during our Investigations, however our NREs only state the $40 rate, so the Principal has never been paid for his Mitigation hours. Can you please provide a clear definition of what is classified as Case Management and Mitigation hours? I've been listing it as Investigative Hours this whole time.
b. I've been listing Travel Time for over a year now and recently was instructed to NOT list the Travel Time which I then had to go back and correct various submissions. Are we now suppose to separate Travel Time again?
6. Other Expenses Summary
Investigators fronting the money for records and having to pay interest until the payment on the NRE is not fair to investigators. Some cases go for months on end before they</td><td>-OPDS is publishing FAQ, written procedures and will have a training video available.
-This form does not address policy, it is only a new submission form that replaces all manual PDF fee statements.
-Vendor Information Tab:
NRE Authorization Format: Updated
-Appellate Panel Tab:
Only required for Routine - Appellate Panel invoice types
-Case and Appointment Information:
The appointment date, from the order, that is entered into Odyssey, regardless of when that data entry actually occurs, should be used. If a case is reviewed at the request of OPDS and not appointed by the court, use the date of the OPDS request.
-Counsel Fees and Expenses Summary:
Only completed by counsel. Other vendors do not need to open or complete this tab.
-Other Services Summary:
a. The NRE authorization indicates what type of services have been approved. If you have specific questions about past invoices, please contact accounts payable.
b. Travel time is only reimbursable per policy and is not applicable to all invoice types and has specific guidelines. If it is an allowable expense we need to see it separately.
-Other Expenses Summary:
This FAQ does not address policy or rates. Rates listed in the drop down are in the Schedule of Guideline Amounts.
-Travel Expense Summary:
The only drop down with rates is for mileage and contains multiple years and rates. If there are multiple rates on the same invoice. Report the most recent on the Mileage line and all others combined in the Travel Expense line. Detail must be supported in attachments.</td></tr>
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ID	Comments	Response
	are billed out leaving our funds held in limbo. **7. Travel Expense Summary** What about the rate variances from previous years? We are still billing some with travel in 2020. Will this be added to the drop downs? **8. Grand Total and Attachments** I'm so glad to see we can just drag and drop with this new system vs having to create one attachment to include the NRE, invoice, receipts and then have to create one attachment for the Batch.	
ID	**Comments**	**Response**
74	Will you be doing away with the master routine expense reimbursement form? If so, it doesn't look like you have the type of routine expenses we usually request (police reports/medical reports etc.) as a drop down item to choose from (Unless you are just calling everything discovery).	-Records has been added to the Out of Pocket Expense tab.

ID	Comments	Response
75	**INMATE PHONE CALLS** Our agency has lost money over the years due to collect calls from our clients. We used to pay on our account and had no problem getting reimbursed. We were suddenly instructed to manage a call log and pay per call. With multiple attorneys, facilities, clients, and investigators – to "pay-per-call" so that we could track who each call is a waste of funds that should be used for a better purpose. ***For example*:** Let's look at Securus Call Fees at $3.75 + per transaction To have a collect call from a client, we must pay about $5 per 2 -3-minutes per call. If we put $5 on a client's calling account, we would have to pay $8+ per client. Putting funds on their calling account allows them to use those funds to call whomever they choose to. If the client doesn't use all those funds, we must ask for a refund, however that takes time to follow up and track and manage. How can we bill the state for calls not knowing if we may have to request a refund? That could lead to an ethical situation. Not only are call logs very time consuming with a higher rate to be reimbursed from the state, but we also must front those fees and pay interest. The state should want the most affordable process. Sometimes, we are paid, sometimes we are not paid in a timely manner. **RECORDS** Most of our attorneys require Records to support the defense case. Not only are these records very time consuming to gather from the facilities, but we also must front those fees and pay interest. As an agency, our records can run over $1K a month plus interest. And again, sometimes, we are paid, sometimes we are not paid in a timely manner. **Criminal Defense Investigator vs New Investigators with no experience** We all know that industry of Private Investigations is losing ground. There's no structured training for PIs. There are no requirements of experience or education, and the attorneys are left with unexperienced investigators coming out of the last testing date excited to make $40 an hour. These individuals are taking on more than they should to get the work, however not focusing on JUSTICE. Our agency doesn't focus on winning or getting the person off. We collaborate with our attorneys and strive for the best possible outcome for our client. Our agency has created training for individuals interested in becoming a Private Investigator. We teach them "how" to investigate, "how" to think about investigating and about the different charges, court processes and much more. Our advantage to this is the Principal's former training and experience. We would like the opportunity to share our training program for Criminal Defense Investigators and provide a training academy type program.	-This form does not address policy or rates.