

ICBVI

Vocational Rehabilitation

Manual

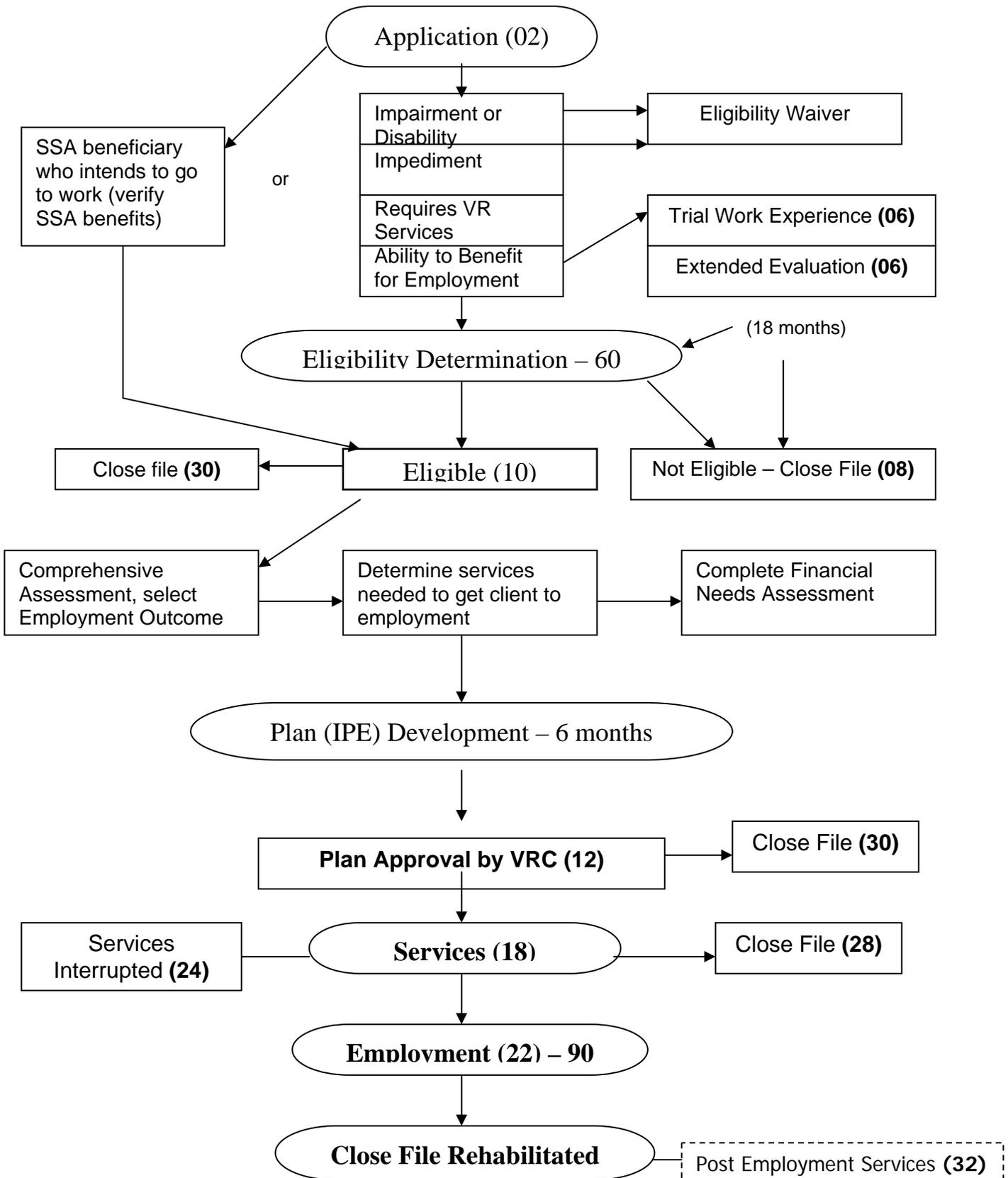
MISSION STATEMENT

Our mission is to empower persons who are blind or visually impaired by providing vocational rehabilitation training, skills training and educational opportunities to achieve self-fulfillment through quality employment and independent living; to serve as a resource to families and employers and to expand public awareness regarding the potential of all persons who are blind or visually impaired.

The Goal of ICBVI's Vocational Rehabilitation Program is EMPLOYMENT

The purpose of ICBVI's Vocational Rehabilitation program is to assist eligible clients with the primary disability of blindness or visual impairment to prepare for, secure, retain or regain employment.

ICBVI VR STATUS FLOW CHART



Glossary of ICBVI Acronyms

A&A	Aids & Appliances
AABD	Aid to Aged, Blind or Disabled
ADA	Americans with Disabilities Act
ACB	American Council of the Blind
AT	Assistive Technology
ATC	Assessment & Training Center
BEP	Business Enterprise Program
BPAO	Benefits Planning Assistance & Outreach (SSA)
CAP	Client Assistance Program
CCTV	Closed Circuit Television
CIL	Center for Independent Living
CIS	Career Information System
CO-AD	Comprehensive Advocacy, Inc.
CFRs	Code of Federal Regulations
CRC	Certified Rehabilitation Counselor
CRP	Community Rehabilitation Program
CSAVR	Council of State Administrators of Vocational Rehabilitation
CSE	Community Supported Employment
DD	Developmental Disabilities
DDS	Disability Determinations Service
DOT	Dictionary of Occupational Titles
FFY	Federal Fiscal Year
HIPAA	Health Insurance Portability & Accountability Act
HKNC	Helen Keller National Center
ICMS	Idaho Case Management System
IDAPA	Idaho Administrative Procedures Act
IDEA	Individuals with Disabilities Education Act
IDVR	Idaho Division of Vocational Rehabilitation
IEP	Individual Education Plan
IL	Independent Living
IL-OB	Independent Living – Older Blind
IPE	Individualized Plan for Employment
ISDB	Idaho School for the Deaf and Blind
IT	Information Technology
JAN	Job Accommodation Network
JSD	Job Site Development
MD	Macular Degeneration
MSD	Most Significant Disability
NCSAB	National Council of State Administrators for the Blind

NFB	National Federation of the Blind
NRA	National Rehabilitation Association
OJT	On-the-Job Training
P & F	Placement & Follow-along
PASS	Plan for Achieving Self-Support
PSR	Psycho-Social Rehabilitation
RP	Retinitis Pigmentosa
RRCEP	Regional Rehabilitation Continuing Education Program
RSA	Rehabilitation Services Administration
RT	Rehab Teacher – Home Instructor
SD	Significant Disability
SFY	State Fiscal Year
SILC	State Independent Living Council
SO	State Only Program for Prevention of Blindness & Sight Restoration
SOC	Standard Occupational Classification
SSA	Social Security Administration
SSDI	Social Security Disability Income
SSI	Supplemental Security Income
TAFI	Temporary Assistance for Families in Idaho
TANF	Temporary Assistance for Needy Families
TWE	Trial Work Experience
VRC	Vocational Rehabilitation Counselor
WOTC	Work Opportunity Tax Credit

ICBVI Client Rights of Appeal and the Client Assistance Program (CAP)

If the VR Counselor and the client are having problems or disagreements, the first step is to discuss the issue between them to try to work things out. If this does not result in solving the problem, the VR Counselor may want to discuss the issue with the Rehab Services Chief.

Clients have the right to seek a remedy for any dissatisfaction with decisions made by ICBVI personnel that affect the provision of vocational rehabilitation services. Clients may request a timely review of any determinations made by ICBVI.

Clients must be notified in writing of these rights at application, at development of Individualized Plan for Employment (IPE) and at closure.

Clients must be notified that their rights include:

1. Informal Dispute Resolution (administrative review) conducted by the Rehab Services Chief. (Must be conducted within the 60 day time frame allowed for the Impartial Hearing.)
2. Impartial Due Process Hearing (fair hearing) by an Impartial Hearing Officer (IHO) to be held within 60 days of client's appeal request, and results in a written decision to client and agency.
3. Mediation is voluntary, conducted by qualified and impartial mediators, and not used to delay or deny client's right to an Impartial Due Process Hearing. Agreements reached during mediation must be put in writing and discussion occurring during the mediation process will be kept confidential.
4. Availability of assistance from the Client Assistance Program (CAP). CAP brochure must be given to client.

During the appeal process ICBVI will not suspend, reduce or terminate services being provided for evaluation, plan development or under an IPE.

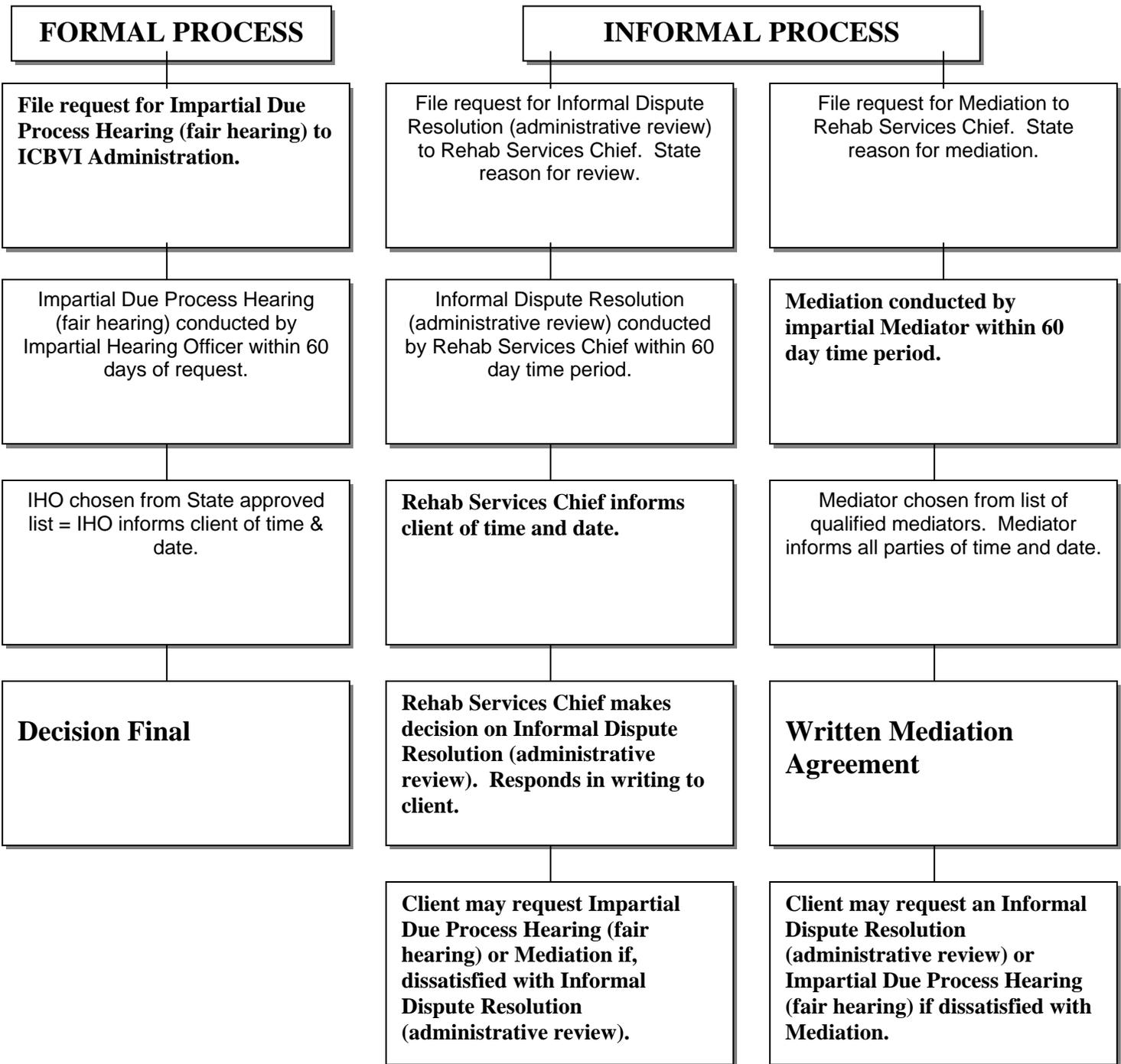
VR Counselor may be involved in any meetings for client appeals.

Client Assistance Program (CAP)

The purpose of the Client Assistance Program is:

1. To inform and advise clients of available services and benefits under the Rehabilitation Act and Amendments. CAP staff can explain how the vocational rehabilitation system works and help clients understand their rights and responsibilities in the vocational rehabilitation process.
2. To assist and to advocate for the client in the relationship with ICBVI. CAP can also suggest ways for the client and VR Counselor to work more successfully together throughout the vocational rehabilitation process, and assist clients to learn to advocate for themselves. Advocacy may also include pursuing any legal, administrative or other appropriate remedies to ensure the protection of the client's rights and to facilitate access to services funded under the Rehabilitation Act that are directly related to facilitating the employment of the client.
3. To use, to the maximum extent possible, alternative forms of dispute resolution, which will include negotiation, facilitation, mediation and fact finding, prior to resorting to litigation or formal adjudication to resolve a dispute.

ICBVI Client Appeals Process



ICBVI Confidentiality of Client Information

1. Confidentiality of Client Records

All personal information concerning clients is confidential. The information is used only for purposes directly connected to the administration of the ICBVI program, and **may not** be released without the informed, written consent of the client. There are some exceptions required by law.

2. Storage of Confidential Client Information

Confidential client information shall be stored in such a manner so that it is not casually available for public scrutiny during official work hours. It shall be stored under lock and key when not being directly used or during non-working hours.

This includes client information on your computer screen. If you are not using your computer, exit the ICMS program. Log out when you will be gone from your office.

3. Release of Confidential Client Information

Any information in the client's file may be released to the client, in a timely manner, if requested in writing by the client. (Use Release of Information form).

There are three exceptions to the above:

- a) Medical, psychological, or other information that ICBVI determines may be harmful to the individual may not be released directly to the individual, but must be provided through a third party, such as a representative, physician or licensed psychologist.
- b) Information obtained from Social Security Administration, including Disability Determination Services may not be released.
- c) Information obtained from the Veterans Administration may not be released.

4. Release to other programs or agencies

Client's personal information **will only be released to other programs or agencies with client's written consent**, and only for the purpose of the client's vocational rehabilitation. Information from Social Security Administration, including Disability Determination

Services, or Veterans Administration **may not** be released.

5. Exceptions to Release of Information Requirements

Prior written approval will not be required for the release of personal data in the following circumstances:

a) Release for audit, evaluation or research.

Information will only be released for purposes directly connected with the administration of the ICBVI vocational rehabilitation program or for purposes that would significantly improve the quality of life for people with disabilities. Confidentiality would be safe guarded.

b) Release required by law:

- 1) ICBVI shall release personal information in response to investigations in connection with law enforcement, fraud, or abuse, unless expressly prohibited by Federal or State laws or regulations, and in response to a court subpoena or judicial order.
- 2) ICBVI may also release personal information in order to protect the client or others when the client poses a threat to the safety of self or others.

6. Amending Information in Client File

If a client believes that information in the file is inaccurate or misleading, the client may request that ICBVI amend the information. If the information is not amended, the request for an amendment must be documented in the file.

7. Retention and Destruction of files

Files will be maintained for five years after case closure. All data with personal identifying client information shall be destroyed by shredding, burning or other disposal methods to ensure confidentiality.

8. It is ICBVI's policy that we respect the confidentiality of our clients. VR counselors should not take applications or work in the rehabilitation process with close friends or relatives. When this situation arises, notify the Rehab Services Chief and arrangements will be made to have another VR counselor work with the client.

ICBVI Disability Codes

The disability code will now be a combination of the impairment code and cause/source code. The first two digits designate the impairment (sensory, physical or mental), and the last two digits indicate the cause or source of the impairment.

Codes for Impairments

00 No impairment

SENSORY/COMMUNICATIVE IMPAIRMENTS:

- 01 Blindness
- 02 Other Visual Impairments
- 03 Deafness, Primary Communication Visual
- 04 Deafness, Primary Communication Auditory
- 05 Hearing Loss, Primary Communication Visual
- 06 Hearing Loss, Primary Communication Auditory
- 07 Other Hearing Impairments (Tinnitus, Meniere's Disease, hyperacusis, etc.)
- 08 Deaf-Blindness
- 09 Communicative Impairments (expressive/receptive)

PHYSICAL IMPAIRMENTS:

- 10 Mobility Orthopedic/Neurological Impairments
- 11 Manipulation/Dexterity Orthopedic/Neurological Impairments
- 12 Both mobility and Manipulation/Dexterity Orthopedic/Neurological Impairments
- 13 Other Orthopedic Impairments (e.g., limited range of motion)
- 14 Respiratory Impairments
- 15 General Physical Debilitation (fatigue, weakness, pain, etc.)
- 16 Other Physical Impairments (not listed above)

MENTAL IMPAIRMENTS:

- 17 Cognitive Impairments (impairments involving learning, thinking, processing information and concentration)
- 18 Psychosocial Impairments (interpersonal and behavioral impairments, difficulty coping)
- 19 Other Mental Impairments

CODES FOR CAUSES/SOURCES OF IMPAIRMENTS:

- 00 Cause Unknown
- 01 Accident/Injury (other than TBI or SCI)
- 02 Alcohol Abuse or Dependence
- 03 Amputations
- 04 Anxiety Disorders
- 05 Arthritis and Rheumatism
- 06 Asthma and other Allergies
- 07 Attention-Deficit Hyperactivity Disorder (ADHD)
- 08 Autism
- 09 Blood Disorders
- 10 Cancer
- 11 Cardiac and other Conditions of the Circulatory System
- 12 Cerebral Palsy
- 13 Congenital Condition of Birth Injury
- 14 Cystic Fibrosis
- 15 Depressive and other Mood Disorders (includes Bipolar)
- 16 Diabetes Mellitus
- 17 Digestive
- 18 Drug Abuse or Dependence (other than alcohol)
- 19 Eating Disorders (e.g., anorexia, bulimia, or compulsive overeating)
- 20 End-Stage Renal Disease and other Genitourinary System Disorders
- 21 Epilepsy
- 22 HIV and AIDS
- 23 Immune Deficiencies excluding HIV/AIDS
- 24 Mental Illness (not listed elsewhere)
- 25 Mental Retardation
- 26 Multiple Sclerosis
- 27 Muscular Dystrophy'
- 28 Parkinson's Disease and other Neurological Disorders
- 29 Personality Disorders
- 30 Physical Disorders/Conditions (not listed elsewhere)
- 31 Polio
- 32 Respiratory Disorders other than Cystic Fibrosis or Asthma
- 33 Schizophrenia and other Psychotic Disorders
- 34 Specific Learning Disabilities
- 35 Spinal Cord Injury (SCI)
- 36 Stroke
- 37 Traumatic Brain Injury (TBI)

Clarification of Disability Codes for Mental Impairments

Codes for Impairments

Causes/Sources of Impairments

17 Cognitive Impairments:

25 Mental Retardation
Specific Learning Disabilities

18 Psychosocial Impairments:

04 Anxiety Disorders
08 Autism (includes Asperger's Syndrome)
15 Depressive and other Mood Disorders (including
Bipolar Disorders)
33 Schizophrenia and other Psychotic Disorders

19 Other Mental Impairments:

02 Alcohol Abuse or Dependence
07 Attention Deficit Hyperactivity Disorder (ADHD)
19 Drug Abuse or Dependence
20 Mental Illness (not listed elsewhere)
29 Personality Disorders

ICBVI Application (Status 02)

Any individual with a disability of blindness or visual impairment that prevents him/her from working may apply for vocational rehabilitation services at ICBVI. Citizenship is not a requirement for ICBVI vocational rehabilitation assistance, but the individual must have legal resident status, be able to complete the Employment Eligibility Verification (I-9) and be present in the state.

To apply for VR services, client must:

1. Meet with VR Counselor, complete and sign the Application.
2. Assist in providing medical and psychological reports to substantiate disability and functional limitations. If an SSA beneficiary, assist in providing evidence of receipt of SSA benefits.
3. Be available to complete assessment process.
4. Be an active and full partner in the vocational rehabilitation process.
5. Intend to achieve an employment outcome.

VR Counselor must:

1. Establish rapport with clients.
2. Provide vocational guidance and counseling to client starting at application and continuing until case closure.
3. Explain the purpose and goal of vocational rehabilitation. Be sure clients know the goal of vocational rehabilitation is employment from the very beginning of the vocational rehabilitation-client relationship.
4. Discuss with your clients, the responsibilities they have in the vocational rehabilitation process and the expectation that full participation will be required of them. Clients need to understand that they must keep appointments, work hard on their own behalf as much as they are able to, complete all tasks assigned by the VR Counselor, be partners in the planning process, maintain regular contact with VR Counselor and discuss any issues that may affect their progress.

A positive and mutually respectful ICBVI-client relationship is essential for the client to progress with ICBVI assistance to successful employment.

5. Explain and complete Application forms:
 - Application for Services
 - Client Rights & Responsibilities
 - **Payment Policy for Services**
 - **Release of Information**
 - **Give client a Client Assistance Program (CAP) brochure, and explain the purpose of CAP.**
6. Request verification of Social Security Administration (SSA) benefits. This should be done on the date of Application. Assess need for Rehabilitation Technology Services, if and when necessary.
7. If SSA beneficiary, discuss the Benefits Planning Assistance & Outreach BPOA Program/SSA Work Incentives Program, Ticket to Work and ICBVI's goal to return clients to employment and get them off SSA benefits, when possible.
8. Inform each client about their rights and responsibilities to exercise informed choice in decisions related to the provision of assessment services.
9. Use **existing** and current **medical and/or psychological data**, including information from other programs and providers, particularly information used by education officials and the Social Security Administration and information provided by the client and the client's family. Medical and/or psychological reports from closed files can be used if data is still current. If existing data does not describe the client's current functioning or if no medical and/or psychological reports are available, then ICBVI can purchase any evaluations necessary to determine eligibility.

Current information will depend on the nature and degree of the client's disability. If the disability is stable and relatively unchanging, then medical/psychological information that is older (several years) can be used (e.g. total blindness, cerebral palsy). If the disability is changeable, then more recent information (last few months) needs to be used (e.g. vision loss, diabetes mellitus, multiple sclerosis, mental illness, etc.).

Medical reports can be utilized without the medical doctor's signature if the report is on letterhead or comes directly from the office and the doctor had direct supervisory oversight of the practitioner.

Medical reports on vision impairments can be used from optometrists or ophthalmologists.

Psychological/psychiatric reports can be utilized without the licensed psychologist or psychiatrist's signature if the report is on letterhead or the practitioner was directly supervised by the licensed psychologist or psychiatrist.

For students with disabilities who will be transitioning from the school system to a working environment, the school psychologist can be used for diagnosis of developmental and learning disabilities. The school psychologist's signature does not need to be on the report, if it is on school letterhead or included in the IEP.

For Mental Health clients being treated by the public Mental Health offices of the Department of Health & Welfare, the Mental Health Clinician, or other professional staff, can be used for diagnosis of mental illness disability as long as they work under the supervision of a licensed psychologist or psychiatrist. A signature is not needed if the report is on Mental Health letterhead.

For clients with substance abuse, diagnostic reports can be used from licensed psychologists, medical doctors or certified drug and alcohol counselors.

For clients with hearing impairments, diagnostics reports can be used from medical doctors or ENT specialists, clinical audiologists, but not from hearing aid dealers.

The Medical Consultant can always be used to confirm diagnoses of disability and functional limitations.

Place forms and reports in a case file and then reference them in the RCR. The RCR needs to be concise but effectively chronicle the client's progress through the vocational rehabilitation system.

A person with a disability is considered to have applied for vocational rehabilitation services with ICBVI when that person has completed and signed the Application and signed the Client Rights & Responsibilities.

Information required on the Application includes:

- a) **Contacts** (spouse, parents, nearest relative) are mainly used to re-establish communication with the client if the client has moved during the rehabilitation process or the client's previous personal information has changed and the client

has not notified ICBVI. Best practice is to include close family members or other people who will remain in contact with the client over time, and who could be utilized in the event direct contact with the client is lost. For example: parent, grandparent, son, daughter, employer, friend, etc.

b) **Financial Information**

The Primary Source of Support needs to be entered.

For clients who indicate they are on some form of Public Support, this refers to **cash payments** made by federal, state or local governments to an individual or family unit. Any non-cash payments such as Medicaid, Medicare, food stamps or rent subsidies are excluded.

Other Public Support payments are **cash payments** made by federal, state or local governments for retirement or survivor benefits, unemployment insurance benefits or other temporary payments.

When a client is receiving a cash payment, enter the dollar amount, e.g. SSI \$603. Occasionally, a client is eligible for Public Assistance but in an overpay or non-pay status. If no cash is being received by the client, then enter \$0.

c) **Education** – Enter the client’s highest level of education achieved.

d) **Employment** – Enter the number of hours worked and the amount of money earned in a typical week at the time of application. This is gross earnings only before any payroll deductions or taxes are taken out. For self-employed individuals, calculate salary based on the adjusted gross income, which is gross income minus un-reimbursed business expenses.

e) **Work History** - Must be completed **comprehensively** as the information is analyzed and used at eligibility to determine if the individual has a substantial I impediment to employment, or can return to previous types of employment.

f) **Disability (Impairment)** - Must be completed with specific information on the client’s vision loss. Secondary disabilities must also be noted.

Running Case Record (RCR) is a tool for the VR Counselor to document events in the case file throughout the progression of the rehabilitation process. The RCR is primarily for those events that do not have a paper trail, such as client contacts, client involvement, vocational rehabilitation guidance and counseling. The RCR is also used to document reports received.

ICBVI Trial Work Experience (TWE) (Status 06)

During the assessment for eligibility, the VR Counselor may find medical, psychological or vocational evidence that indicates the client may be incapable of benefiting in terms of an employment outcome from vocational rehabilitation services due to the severity of the disability.

Clients who are current SSI or SSDI beneficiaries are presumed to be eligible for vocational rehabilitation services unless VR Counselor can demonstrate by clear and convincing evidence that such individual is incapable of benefiting in terms of an employment outcome from vocational rehabilitation services due to the severity of the disability.

Trial Work Experience should be used to demonstrate whether the client is capable of benefiting from vocational rehabilitation services. **TWE will be conducted before Presumptive Eligibility is completed.**

The VR Counselor must provide the client with individual Trial Work Experiences (TWE) of sufficient variety and over a sufficient period of time to determine if the client is eligible for vocational rehabilitation services or that clear and convincing evidence exists that the client is incapable of benefiting in terms of an employment outcome from vocational rehabilitation services.

The Trial Work Experience must explore the client's abilities, capabilities and capacity to perform in realistic work situations with support and training. TWEs may include supported employment, OJT or other experiences in realistic work settings.

To place client in Trial Work Experience, VR Counselor must:

- 1) Determine that client has a significant physical or mental impairment (disability) that is a substantial impediment (barrier) to employment.
- 2) Have questions about whether the client is capable or incapable of benefiting in terms of an employment outcome from vocational rehabilitation services due to severity of disability.
- 3) With the client, develop a Trial Work Experiences plan to assess the client's ability, capabilities and capacity to perform in realistic work situations through the use of Trial Work Experiences. The TWEs must be provided in the most integrated setting possible, consistent with the informed choice and rehabilitation needs of the client. TWEs may include vocational evaluation, work adjustment, Community Supported Employment, job coaching, on-the-job training or other experiences using realistic

work settings, as well as assistive technology and other needed services.

- 4) Review Client Rights and Responsibilities.
- 5) Assess need for Rehabilitation Technology Services, if and when necessary.
- 6) Insure that client is an active partner, making meaningful and informed choices in the provision of Trial Work Experiences.
- 7) Review the TWE Plan at least every 90 days to determine if there is sufficient evidence to conclude that the client can benefit from vocational rehabilitation services in terms of an employment outcome or there is clear and convincing evidence that the client is incapable of benefiting from vocational rehabilitation services in terms of an employment outcome due to the severity of the disability.
- 8) Make the determination for eligibility or case closure within the 18-month time frame.

ICBVI Extended Evaluation (EE) (Status 06)

The purpose of Extended Evaluation is to determine if the client is capable or incapable of benefiting from vocational rehabilitation services in terms of an employment outcome due to the severity of the disability.

When questions about ability to benefit are raised, ICBVI must first conduct Trial Work Experiences. Extended Evaluation is only used when the client is unable to take advantage of such realistic work experiences, or if options for Trial Work Experiences have been exhausted.

For example: ICBVI and Community Rehabilitation Program (CRP) are unable to locate a job site for the client for TWE in the community. Extended Evaluation may then be conducted in a CRP or on a mobile work crew.

Clients who are current SSDI or SSDI beneficiaries are presumed to be eligible for vocational rehabilitation services unless ICBVI can demonstrate by clear and convincing evidence that such individual is incapable of benefiting in terms of an employment outcome from vocational rehabilitation services due to the severity of the disability.

Extended Evaluation should be used to demonstrate whether the client is capable of benefiting from vocational rehabilitation services. **Extended Evaluation will be conducted before Presumptive Eligibility is completed.**

To place client in Extended Evaluation, VR Counselor must:

- 1) Determine that client has a significant physical or mental impairment (disability) that is a substantial impediment (barrier) to employment.
- 2) Have questions about whether client is capable or incapable of benefiting in terms of an employment outcome from vocational rehabilitation services due to severity of disability.
- 3) Have conducted Trial Work Experience or determined that client is unable to take advantage of TWE.
- 4) With client, develop an Extended Evaluation plan to assess client's abilities, capabilities and capacity to perform in work settings. During the Extended Evaluation, vocational rehabilitation services must be provided in the most integrated setting possible, consistent with the informed choice and rehabilitation needs of the client.

ICBVI will only provide those services necessary to make the determination of ability to benefit.

- 5) Review Client Rights and Responsibilities.
- 6) Assess need for Rehabilitation Technology Services, if and when necessary.
- 7) Insure that client is an active partner, making meaningful and informed choices in the provision of Extended Evaluation.
- 8) Review the Extended Evaluation Plan at least every 90 days to assess progress.
- 9) Terminate Extended Evaluation services as soon as ICBVI is able to make the determination of the client's ability or inability to benefit in terms of an employment outcome.
- 10) Make the determination for eligibility or case closure within the 18 month timeframe.

ICBVI Eligibility (Status 10)

Eligibility is the foundation on which the rehabilitation plan for employment is built. It is at this point that the VR Counselor assists the client to understand his/her physical and/or mental disabilities and how they may limit the client from being able to work. We must build a solid foundation so that when the plan is written to address the barriers to employment that the client is facing, it is solid but also flexible enough to meet the client's rehabilitation needs to move to employment.

To be eligible for ICBVI VR Services, a client must either:

1. Have a physical or mental impairment (disability) including blindness or visual impairment {as defined in Idaho Code, Section 67-5402(2)}.
2. Which constitutes or results in a substantial impediment (barrier) to employment
3. Requires vocational rehabilitation services to prepare for, secure, retain or regain employment, and
4. Can benefit in terms of an employment outcome.

OR Be an SSI or SSDI beneficiary who intends to achieve an employment outcome.

(Completion of the vocational rehabilitation application process is sufficient evidence of the beneficiary's intent to achieve an employment outcome.)

An impairment is any disability, physical, mental or emotional that causes limitations in a functional area such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance or work skills.

According to Idaho Code, blindness or visual impairment means a person whose visual acuity with correcting lenses is not better than 20/200 in the better eye; or a person whose vision in the better eye is restricted to a field which subtends an angle of not greater than 20 degrees; or a person who is functionally blind; or a person who is without any sight.

Functionally blind means a person with a visual impairment which constitutes or results in a substantial impediment to employment or substantially limits one or more major life activities such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance or work skills. (This is determined by the VR counselor, not the physician).

An impediment is any barrier, hindrance or obstruction that prevents the client from performing the tasks required for employment. The impediment to employment must be caused by the disability, not because the employer went out of business or the client doesn't like their job anymore and wants to do something else. The client must be physically, mentally or emotionally unable to perform the job.

Requires vocational rehabilitation Services mean that the client cannot do it on their own and they need assistance from ICBVI

Employment means work in the competitive labor market that is performed on a full-time or part-time basis in an integrated setting; and for which an individual is compensated at or above minimum wage, but not less than the customary wage and level of benefits paid by the employer for the same or similar work performed by individuals who are not disabled.

Employment outcome means entering or retaining full-time or, if appropriate, part-time competitive employment in the integrated labor market, supported employment, or any other type of employment in an integrated setting, including self-employment, telecommuting, or business ownership, that is consistent with an individual's strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice.

Integrated Setting means with respect to an employment outcome, a setting typically found in the community in which clients interact with non-disabled individuals, (excluding service providers), to the same extent that non-disabled individuals interact with other people in comparable positions.

VR Counselor must:

1. The VR Counselor works with the client to gather all the information necessary for the eligibility determination, e.g. medical reports, psychological reports, educational reports and Individualized Education Plans (IEP), functional limitations, past work history, etc.

Make sure that you not only get medical information on the visual impairment but also on all the other disabilities, as these may have more effect on the client's eventual success than the visual impairment.

2. Review and analyze all the client's pertinent medical and psychological information and then synthesize the information to justify the eligibility decision.

3. Remember, the VR Counselor makes the determination of eligibility.
4. Document the client's eligibility for Vocational Rehabilitation as follows:

Impairment:

Identify all physical and/or mental disabilities diagnosed or determined by medical, psychological or other qualified personnel. Identify all specific functional limitations cause by each disabling condition.

Substantial Impediment to Employment:

Review all past work history and determine specifically why client is unable to return to any type of past employment because of each disability and its associated functional limitations.

Why can't the client return to previous work? What are the barriers to employment for this client?

If the client has never worked, why can't client get a job or keep a job or compete with peers in the job market?

If client is currently working, why can't the client retain or keep employment without VR assistance?

Need for Services:

What services does the client require to prepare for, secure, retain or regain employment that is consistent with the client's unique strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice? What services need to be included on the Individualized Plan for Employment (IPE) so that the client can overcome the above-listed barriers to employment?

Presumption of Benefit:

If the client meets the above criteria, the Rehabilitation Act presumes that the client can benefit in terms of an employment outcome, unless ICBVI can demonstrate by clear and convincing evidence that the client is unable to benefit in terms of an employment outcome from vocational rehabilitation services.

5. Make eligibility decision within a reasonable period of time, not to exceed **60 days** after Application, unless the client agrees to an extension of time and signs an Eligibility Waiver.

6. Complete Presumptive Eligibility for any client who is currently receiving SSI or SSDI benefits, who intends to achieve an employment outcome, and is not too severely disabled to work.

VR Counselor must verify that the client is receiving SSA benefits and then complete Presumptive Eligibility as soon as the verification is received.

Presumptive Eligibility is required by the Rehabilitation Act and Code of Federal Regulations because significant information has been compiled by SSA to meet vocational rehabilitation eligibility and the definition of significant disability (SD). These reports can be accessed through your local Social Security office. SSI files are kept in the local Social Security offices, and SSDI files can be requested from Baltimore by Social Security.

We will need this SSA information, and possibly more comprehensive assessment information to write the IPE with our client.

Remember, that even though SSA beneficiaries are presumed eligible for Vocational Rehabilitation, the same analysis of disability and barriers to employment needs to be done, so that the VR Counselor and the client can build an appropriate IPE.

7. Complete the Eligibility Waiver if the eligibility decision cannot be made within 60 days of application and the client agrees in writing to the extension of time.

Reasons for using Eligibility Waiver must be exceptional and unforeseen circumstances beyond the agency's control, meaning that the reason was something that ICBVI had no control over and could not have anticipated.

Examples:

- a) client had additional medical or psychological issues that required time to stabilize
- b) client was unable to complete an evaluation due to physician's office schedule
- c) client was unavailable or out of state for long period of time
- d) client missed appointment for evaluation and had to wait for rescheduling.

Eligibility Waiver is not to be used if VR Counselor just did not get the medical/psychological information in a timely manner or did not get paperwork for eligibility done in the 60-day time frame.

Time frame: a reasonable amount of time for the extension is 30-60 days unless there are extenuating circumstances.

Client agreement: the client must agree to the extension of time and does so by signing the Eligibility Waiver.

8. Utilize the Medical Consultant when there are any questions about medical issues or reports. Medical consultation is recommended to:
- a) Review medical information.
 - b) Clarify diagnosis and determine functional limitations.
 - c) Determine need for medical evaluation or treatment, e.g. MRI, CT Scan.
 - d) Consult with other medical professionals, if needed.
- The Medical Consultation should be documented in the RCR.

Remember, the Medical consultant does not determine Eligibility for vocational rehabilitation, the VR Counselor does.

9. Make the determination of Disability Priority, which includes:
- a) no significant disability
 - b) no significant disability (SD)
 - c) most significant disability (MSD)

Remember that if your client is a current SSI and/or SSDI beneficiary, then he/she is automatically SD. However, depending on the severity of the disability or disabilities you may need to code him/her as MSD.

The federal definition of SD in the Code of Federal Regulations are as follows:

SD means an individual with a disability:

- a) who has a **severe physical or mental impairment** which seriously limits **one or more functional capacities** (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome;
- b) whose vocational rehabilitation can be expected to **require two or more vocational rehabilitation services over an extended period of time 6 months or more**; and
- c) who has one or more physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, head injury, heart disease, hemiplegia, hemophilia, respiratory or pulmonary dysfunction, mental retardation, mental illness, multiple sclerosis,

muscular dystrophy, musculo-skeletal disorders, neurological disorders (including stroke and epilepsy), paraplegia, quadriplegia, and other spinal cord conditions, sickle cell anemia, specific learning disability, end-stage renal disease, or another disability or combination of disabilities determined on the basis of an assessment for determining eligibility and vocational rehabilitation needs to cause comparable substantial functional limitation.

MSD means an individual with a disability who **meets the criteria of SD above**, and is further defined as:

- a) having a **severe physical, mental, cognitive or sensory impairment** which seriously limits **three or more functional capacities** (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance or work skills) in terms of an employment outcome; and
- b) whose vocational rehabilitation can be expected to **require two or more vocational rehabilitation services over an extended period of time of 6 months or more.**

Using the SD/MSD Reference Sheet, justify why the VR Counselor thinks that the client qualifies for SD or MSD. Make the justification specific to the client and the functional limitations caused by the disability or disabilities and how they affect the client in the employment situation.

10. Assess need for Rehabilitation Technology Services, if and when necessary.
11. Insure that the client is an active participant, making meaningful and informed choices throughout the vocational rehabilitation process.
12. Complete the Certificate of Eligibility and provide client with a copy. Remember to review the Client Rights and Responsibilities with the client.

Make sure all dates for Eligibility are the same, in ICMS and on the Certificate of Eligibility.

ICBVI Helpful Hints on Functional Blindness

Medical documentation:

- Best corrected acuity and visual fields
- Diagnosis and prognosis
- Treatment recommendations
- Restrictions to activity at home or work

Functional Limitations:

- Reading printed material
- Driving
- Walking (avoiding obstacles, negotiating stairs, curbs or crossing streets)
- Computer work
- Written correspondence
- Classroom problems with board, audio-visual, PowerPoint, etc.
- Problems with shopping
- Problems with daily activities (cooking, cleaning, medication id)
- Glare problems
- Distortion
- Floaters or scotomas
- Fluctuating vision throughout the day
- Any of the above affecting work
- Diabetes not under control due to lack of education

Requires ICBVI VR services:

- Needs low vision evaluation
- Needs low vision aids or alternative techniques of blindness
- Needs training on use of aids or independence skills
- Needs vocational counseling and guidance
- Unable to perform previous or current work due to visual impairment
- Needs financial assistance
- Needs specialized training (diabetic education)
- Not familiar with community resources
- Needs training at the Assessment and Training Center (ATC)
- Needs Adaptive Technology (AT) on the job
- Needs training on AT

ICBVI Order of Selection (OOS)

Order of Selection (OOS) is a strategy used when vocational rehabilitation services cannot be provided to all eligible clients due to a lack of adequate funding and/or personnel.

The OOS strategy is a priority system to identify clients with different levels of significance of disability. There are three levels:

PRIORITY #1 – Most Significant Disability

Clients must have at least three functional limitations to employment and require two or more substantial services over an extended period of time (6 months or more).

PRIORITY #2 – Significant Disability

Clients must have at least one functional limitation to employment and require one or more substantial services over an extended period of time (6 months or more).

PRIORITY #3 – Not a Significant Disability

Clients must have one functional limitation to employment and require one or more substantial service. There is no requirement for an extended period of time.

The Order of Selection will only affect clients in Applicant status through Eligibility (status 02 to status 10).

Clients currently in plan at the time the Order of Selection is implemented will continue to receive services without regard to the level of significance of disability.

VR counselor must:

1. Explain the existence and purpose of the OOS so that the client can understand the potential delay in receiving vocational rehabilitation services. The client may decide not to complete the Application at this time.
2. If the client wishes to apply, take the Application, gather medical and other information and determine Eligibility
3. Determine the level of significance of disability using **the ICBVI SD/MSD Functional Limitations Form** and the **ICBVI OOS Significance of Disability Form**.

4. Place the client in status 04, which designates that the client is eligible and has been placed on the OOS waiting list until funds and/or personnel become available to provide vocational rehabilitation services.
5. Contact the client at least once every 90 days to assess the client's interest to continue to remain on the OOS waiting list until vocational rehabilitation services are available. If the client no longer wants services, then close the case file using Status 38.
6. A client's priority level may change if further medical documentation shows an increase in functional loss and need for services sufficient that the level of significance of disability needs to be reprioritized.

ICBVI OOS Significance of Disability Form

Client name: _____

The client has functional limitations in the following areas:

1. Mobility
2. Self-Direction
3. Self-Care
4. Interpersonal Skills
5. Communication
6. Work Tolerance
7. Work Skills

Substantial Services needed:

Minimum estimated time to complete the substantial services:

_____ Less than 6 months _____ More than 6 months.

Significance of Disability (check only one).

_____ **PRIORITY #1 – Most Significant Disability**

Client has at least three functional limitations to employment and requires two or more substantial services over an extended period of time (6 months or more).

_____ **PRIORITY #2 – Significant Disability**

Client has at least one functional limitation to employment and requires one or more substantial services over an extended period of time (6 months or more).

_____ **PRIORITY #3 – Not a Significant Disability**

Client has a physical or mental disability, which results in a substantial impediment to employment and can benefit in terms of employment from VR services.

VR Counselor Signature

Date

ICBVI SD/MSD Functional Limitations Form

There are seven (7) functional capacities used by ICBVI to determine the **level of significance of a client's disability**. The functional limitations must be caused by the disability and have a severe impact on the client's ability to be employed.

Mobility: the ability to move about from place to place and move the body into various positions.

1. Regularly requires and presently does not have any of the following to get around in the community: modifications, adaptive technology, accommodations, assistance (person or device), and adaptive techniques
2. Range of travel is severely limited. Has not yet acquired and/or demonstrated the ability to travel outside of a severely limited area
3. Takes significantly longer time to move about than the average person
4. Cannot safely change body position or move about without assistance of others

Self Direction: the ability to take control and manage your personal, social and work life.

1. Requires supervision on a frequent or ongoing basis to carry through with goals, plans, job tasks or decisions
2. Requires intense one-on-one supervision beyond what is typical when entering a new work setting
3. Highly distractible with short attention span and severe difficulty concentrating on work
4. Unaware of consequences of behavior and unable to monitor own behavior

Self-Care: the ability to perform basic personal care and independent living activities.

1. Requires assistance on the job for personal needs
2. Places self at risk due to poor decision-making, reasoning, and judgment
3. Unable to handle money and/or paycheck

Interpersonal Skills: the ability to establish and maintain personal working relations with others.

1. Work history includes recent negative references, firings, or multiple short-term jobs or other evidence of work adjustment problems

2. Serious problems in interpreting and responding appropriately to the behavior and/or communication of others
3. Unable to establish and maintain acceptable personal interaction appropriate to the worksite
4. Social isolation or withdrawal or rejection by coworkers
5. Frequent conflict with coworkers or supervisors

Communication: the ability to effectively exchange ideas and information through written or spoken words.

1. Does not possess the alternative techniques of blindness to access printed material
2. Unable to participate in conversation without speech reading, sign language, or other assistive technology
3. Not readily understood by others on the first contact or doesn't readily understand others on first contact
4. Talks excessively, interrupts, intrudes inappropriately to the point that natural communication is impeded
5. Unable to express needs to either supervisors, co-workers or both

Work Tolerance: the ability to perform physical and psychological demands for the job.

1. Unable to sustain movement of arms, hands and fingers or prolonged standing or sitting for a typical 8 hour work day
2. Unable to lift more than 50 lbs. frequently or carry more than 25 lbs
3. Requires modification or assistive technology to meet essential strength and stamina requirements of the job (e.g. rest periods, adjustments to positioning, flex schedule, shorter work day or week)
4. Likely to be absent from work three or more days per month due to necessary treatments or medical problems
5. Unable to tolerate common psychological stresses found in typical work environments

Work Skills: the ability to perform tasks needed on the job.

1. Unable to learn new tasks without intensive and/or specialized instruction
2. Unable to participate in training to develop work skills without VR intervention in terms of adaptive technology or accommodations
3. Speed in performing simple manual tasks is significantly reduced

4. Has not learned work skills usually possessed by person of comparable age, education or experience
5. As a result of the disability reading, spelling or math skills are below fifth grade level
6. Has disability-related symptoms or medication side effects which interfere with the ability to concentrate or complete work

ICBVI Payment Policy

Policy:

It is the policy of the Commission to pay usual, customary and reasonable charges for services provided to its clients by providers of goods or services except for the following list. Exceptions may be made for geographical or other considerations. All ICBVI staff will negotiate rates of payment in the best interest of the organization.

ICBVI is not obligated to pay the total cost of services needed to assist clients to employment outcomes. We will always encourage the pursuit of comparable benefits and client financial participation in paying for the costs of the plan. If clients have private insurance, Medicaid, Medicare or other coverage, these must be used first prior to expenditure of ICBVI funds.

Rates of Payment:

These fees are established in accordance with federal guidelines that permit an agency to establish fee limits for services designed to ensure a reasonable cost to the program for each service.

Whenever possible, a competitive process will be used to achieve a reasonable price. Idaho is a low bid state; therefore, the lowest bid will then be the maximum amount ICBVI will contribute to the purchase of goods or services. The Payment Policy will determine the maximum that ICBVI will contribute to the purchase. For items not included in the payment policy, the usual, customary and reasonable rate will be used for the service, not to exceed the rate charged other public agencies. The service that will meet the client's need at the least cost to ICBVI shall be the service purchased.

All decisions on client cases, including fee for services, are determined on an individual case basis. The client may choose his or her preferred vendor, but if the client chooses a product or vendor that exceeds the maximum rate of payment established by the Payment Policy, the client will be responsible for the excess amount.

Exceptions to Usual, Customary and Reasonable Charges:

- 1) Idaho Public In-State Colleges, Vocational Technical Schools, Universities, and Other Education and Training Institutions education expenses (fees and tuition, including health insurance fees).

Maximum: \$1650 per semester x 2 per year (**\$3300 max per federal fiscal year**)

\$1100 per quarter x 3 per year (\$3300 max per federal fiscal year) If the client receives a Pell Grant, it must be applied first for tuition or fees. ICBVI may pay the difference up to the \$3300 per year maximum.

These yearly maximums include summer school.

Exceptions: (Must be reviewed and approved by Rehab Services Chief.

- a. ICBVI may pay for summer school if it is a required part of a Vocational or Technical Program, e.g. Welding – 5 sessions per year.
 - b. ICBVI may pay for academic summer school if by attending the client will be able to finish their final semester and not have to attend in the fall.
 - c. ICBVI may pay for summer school in exception cases as a disability-related reasonable accommodation.
- 2) Idaho Private In-State Colleges, Vocational Technical Schools, Universities, and Other Education and Training Institutions, education expenses (fees and tuition, including health insurance fees.)

Maximum: ICBVI may pay up to \$3300 per federal fiscal year for any in state training, public or private.

If the client receives a Pell Grant, it must be applied first for tuition or fees. ICBVI may pay the difference up to the \$3300 per year maximum.

- 3) Out-of-State Colleges, Universities, Vocational Technical Schools and Other Education and Training Institutions.
- a. If the ICBVI client must attend an out-of-state institution because the course of study is not offered within the state of Idaho then ICBVI can pay the “usual and customary” charges for fees and tuition.
 - b. If the course of study is offered in-state, but because of the additional costs caused by the accommodation for disability, it would be more cost effective for the agency to have the client attend the out of state educational institute, then ICBVI may pay the usual and customary tuition charges for the out of state educational institution.

This must be addressed by the Counselor in the interest of informed client choice in the initial vocational guidance and counseling.

- c. If the client chooses to attend an out-of-state institution, then ICBVI will only pay the Idaho in-state maximum cost (fees and tuition).

Maximum:

\$1650 per semester x 2 per year (**\$3300 max per federal fiscal year**)

\$1100 per quarter x 3 per year (**\$3300 max per federal fiscal year**)

These yearly maximums include summer school.

The maximum for training and educational costs include **all** training provided by ICBVI: cosmetology, short term computer training, etc.

4) Books and Supplies

Maximum:

\$300 per semester x 2 per year (**\$600 maximum** per federal fiscal year)

\$200 per quarter x 3 per year (**\$600 maximum** per federal fiscal year)

For Vo-Tech programs, where most of the books are required at the beginning of the first semester, ICBVI can issue for required books not to exceed \$600 per federal fiscal year.

These yearly maximums include summer school.

5) Medical exams with written report.

- a. Specialist exam by M.D. **\$200 maximum**, plus actual cost of related procedures (e.g. x-rays).
- b. Psychological exam by Licensed Psychologist **\$200 maximum** plus actual cost of psychometric tests.
- c. Ophthalmologist/Optometrists exam **\$200 maximum**, plus actual cost of visual field exam or other necessary tests.
 - Low vision exam **\$125 maximum**.
 - Follow-up low vision consult **\$55 maximum**.

- Eye report \$25 **maximum**.
 - Eye glasses or contact lenses
 - Frames - \$80 **maximum**
 - Lenses - usual and customary cost
 - Contact Lenses - usual and customary cost
 - Bioptics \$700 **maximum**.
- d. Audiologist exam \$85 **maximum**
- e. Physical exam (GBM) \$65 **maximum**
- 6) Psychotherapy/Counseling Sessions
- Maximum:** \$80 per hour, 10 sessions
- 7) Medication and Medical Supplies (including diabetic supplies)
- Maximum:** \$300 per month for 3 months, while client applies for reduced cost or free medication programs provided by drug companies or other sources of comparable benefits, such as Medicaid, Medicare Part D or other insurance.
- 8) Dental Work, including but not limited to cleaning, fillings, extractions, crowns, and dentures.
- Maximum:** \$500 per case
- 9) Transportation
- a. Public conveyance (bus, van, airfare) - actual cost.
 - b. Transportation costs not to exceed \$100 **maximum** within a 20 mile radius in-town commuting, or \$200 **maximum** out-of-town commuting per month.
 - c. ICBVI does not reimburse for state mileage rate for client services but may reimburse for cost of gasoline.
 - d. Cab subsidy programs (Scrip) must be used where available; Idaho Falls, Pocatello and Boise

10) Maintenance

Maintenance means monetary support provided to an individual for expenses, such as food, shelter, and clothing, that are in excess of the normal expenses of the individual and that are necessitated by the individual's participation in an assessment for determining eligibility and vocational rehabilitation needs or the individual's receipt of vocational rehabilitation services under an individualized plan for employment. (Ref: 34 CFR Part 361.5 (35).)

Counselors cannot pay maintenance for those existing living costs that an individual would normally incur regardless of the individual's participation in a plan of vocational rehabilitation services.

Maximum: \$1,500 total per federal fiscal year. No single monthly amount to exceed \$300. No limit on number of months up to the \$1,500 **maximum**.

These maximums also apply to Room & Board for post secondary education and to any rent payments.

If the client receives SSI and /or SSDI, these funds must be used for Room & Board for post secondary education costs.

Maintenance for ATC

If the client receives SSI or SSDI, ICBVI usually will not provide maintenance for the time spent at the ATC as these funds are provided by Social Security for basic living expenses. However, if special circumstances are present, then the VR counselor, in consultation with the Rehab Services Chief, will determine if maintenance is to be paid to the client for incidental expenses while participating in ATC and the dollar amount allowed up to the maximum.

An example of special circumstances would be if a client has to continue renting in their hometown and this requires expenditure of their SSI or SSDI funds.

Maintenance of \$300 **maximum** per term can be paid to clients for incidental expenses while participating in ATC. Maintenance will not be paid during the ATC breaks, if client remains in ICBVI housing.

11) Copy Fees

Maximum: \$15 for copy of report.

12) Tools & Equipment

Maximum: \$1,000 per case. Agency inventory tools and equipment will count towards the \$1,000 maximum. ICBVI counselor must always negotiate in the best interest of the agency on cost of services and may get three bids.

Exception: If there is a change in employment outcome, client **must** return the original tools to ICBVI. After the tools have been returned, then ICBVI may purchase new tools up to the \$1,000 maximum for the new employment outcome.

13) OJT Fees

Maximum: \$3,000

a. Counselor must negotiate OJT fees based on:

1. Employer's cost to train client
2. Level of technical skills required for job

b. IPE and OJT Agreement must include:

1. Cost of training
2. Length of time (# of months)

Counselors are strongly encouraged to negotiate a decreasing payment schedule with the employer.

To exceed the \$3,000 **maximum**, Counselor must consult with Rehab Services Chief.

14) Computers including hardware and software.

Maximum: \$1,000 per case, except for disability-related reasonable accommodation.

If a change in computers is necessary, client **must** return the original computer to ICBVI. Upon its return, ICBVI may purchase a new computer up to the \$1,000 maximum

15) Self-Employment Plans

Maximum: \$3,000

To exceed the \$3,000 **maximum**, Counselor must consult with Rehab Services Chief.

Any special circumstances on computers and tools on self-employment plans will be discussed with Rehab Services Chief.

16) Child Care

Maximum: \$300 per child per month.

Use the Health & Welfare Child Care Funding as a comparable benefit before expending ICBVI funds.

17) Advanced Degree

ICBVI may assist with an advanced degree, based on the rehabilitation needs of the individual client, if client is unable to achieve employment with an undergraduate degree.

18) **Typical exclusions** from ICBVI financial participation:

- a. Vehicular purchase, however, ICBVI may assist to modify an already owned vehicle to make it accessible for the client's use (e.g. hand controls, van conversions, lift installation).
 1. The cost of the modification cannot exceed the current Blue Book value of the vehicle.
 2. The client must maintain insurance on the vehicle for replacement cost.
 3. ICBVI encourages the use of loans from the Idaho Assistive Technology Project and Independent Living Centers.
- b. Organ transplantation.
- c. Physical and Mental Restoration Services. Surgery may be provided if it is not the sole vocational rehabilitation service needed for the client to return to work or to achieve an employment outcome.

ICBVI will only cover the cost of surgery if it will substantially reduce the client's functional limitations.

ICBVI will only cover the cost of surgery or therapeutic treatment necessary to correct or substantially modify a physical or mental condition that constitutes a substantial impediment to employment, if it will reduce such impediment to employment within a reasonable length of time

When physical restoration services for individuals who have a temporary disability, which will be eliminated by surgical care in an acute general hospital, is the only vocational rehabilitation service to be provided, and the condition is likely to be remedied by relatively routine medical intervention with no significant lasting effects, the RSA position is that such cases should be referred to other agencies. Such services should not be paid for under vocational rehabilitation auspices. *—(RSA Position Paper, 3/28/80, Robert R. Humphreys, Commissioner of RSA).*

These clients should be referred to the State Only Program for sight restoration and prevention of blindness.

19) No Shows

If a client "no shows" to an appointment and doesn't cancel or reschedule, the client will be responsible for payment of any charges, not ICBVI.

If ICBVI authorizes for an interpreter to be present and client no shows, ICBVI will cover cost of the interpreter through administrative authorization.

Exception Policy:

The Rehabilitation Act of 1973, as amended, requires that ICBVI have a policy that allows for exceptions to the Payment Policy, unless the exception would violate State or Federal laws. All exceptions will be reviewed on an individual case basis, and require approval by the Rehab Services Chief.

Exception Process:

To be considered for an exception, the client and Counselor shall submit the request for the exception in writing by email to the Rehab Services Chief.

The request must include:

1. A description of the requested exception.
2. Detailed reasons why they believe the exception is warranted.

The Rehab Services Chief will have 10 days from the date of receipt of the request to make a decision. The Counselor should be careful to explain to the client prior to submission that just because they request an exception there is no guarantee that it will be approved. If the request is approved, written notification by email will be sent to the Counselor and this will be placed in the case file.

The Rehab Services Chief reserves the right to deny any request.

If a request for exception is denied, the client must be informed of the reason why and of his/her right to appeal the decision within 10 days of notification of the denial.

Reasons for Exception:

The items listed below are not all inclusive, but do contain the major reasons that will be considered in determining if an exception to policy will be granted. Financial need alone is not always sufficient grounds for asking for an exception. While a client may present one or more of these reasons for an exception, Counselors should use discretion in requesting an exception. It is sometimes the nature and scope of the reason and not the number of reasons that may justify the exception.

1. The need is disability related.
2. The client has used all sources available, including client's own financial contribution, as well as all available Federal Financial Aid in post-secondary training situations, insurance, Medicaid, Medicare and other resources typically used by persons without disabilities.
3. Family issues such as legal separation, divorce or loss of income make resources unavailable.
4. Service is not available in certain geographical locations of the state within the Payment Policy maximums.

ICBVI Financial Needs Assessment (FNA)

PURPOSE OF FNA:

- ◆ Counselor Tool
- ◆ Effective resource utilization
- ◆ Career planning
- ◆ Consistency of service provision statewide
- ◆ Counselor/client accountability

The FNA can be used as a counseling tool for **all** clients:

- ◆ For counseling related to client's level of debt and money management skills.
e.g. Should client be referred to professional consumer credit counseling agency?
- ◆ For career planning to determine clients' current financial status, and ability to participate in rehab plan.
e.g. Does the client need to go to work immediately? Can client afford to attend a one, two or four year training program? How will client and family survive economically while attending training program?
- ◆ For career planning to determine client's economic needs for employment outcome.
e.g. What hourly wage does client need to earn? Does client need to work 40 hours per week or less? Does client need to purchase health insurance?
- ◆ To determine amount of client's participation in paying for the costs of the rehabilitation plan. The client needs to be encouraged to participate financially in the rehabilitation plan, so regardless of whether client has a budget surplus or deficit, **ask how much the client can contribute financially to the cost of rehabilitation plan**. The client needs to be vested in and committed to the success of his/her rehabilitation plan.
- ◆ If client is a minor child (under age 18 or claimed as dependent on income tax), or is under legal guardianship, then the family income needs to be included on FNA. If client is married, the spouse's income needs to be included on FNA. If extended family (members living in household) expenses are included on FNA, then their income also needs to be included. VR Counselor should always encourage financial participation in rehabilitation costs and negotiate in the best interests of the agency.

EXCEPTIONS:

The FNA **does not** need to be taken for certain VR services or if client already meets low income guidelines or is receiving SSDI:

VR Services:

- ❖ Referral
- ❖ Diagnostics and Evaluations
- ❖ Vocational Guidance and Counseling
- ❖ Trial Work Experience or Extended Evaluation Plans (Status 06)
- ❖ No Cost Plans
- ❖ On the Job Training (OJT) (fee only)
- ❖ Rehabilitation Technology
- ❖ Job Placement Services including Job Site Development (JSD), Work Adjustment or Job Coaching, Placement and Follow along (P&F), Community Supported Employment (CSE)
- ❖ Personal Assistance Services
- ❖ Auxiliary Aids or Services including Interpreter or Reader Services

Low Income Programs:

- ❖ Temporary Assistance for Families in Idaho (TAFI)
- ❖ Supplemental Security Income (SSI)
- ❖ Dual recipients of SSI and SSDI
- ❖ Aid for Aged, Blind and Disabled (AABD)

Other:

- ❖ Social Security Disability Insurance (SSDI)
VR cannot require FNA of SSDI beneficiaries to require the client's participation in the cost of planned services. However, you can continue to use the FNA as a counseling tool and as a financial planning document with your clients.

You can also negotiate your client's financial participation in the cost of the IPE Services, on an informed consent basis.

COMPARABLE SERVICES OR BENEFITS:

Comparable services and benefits are any services or benefits provided or paid for, in whole or in part, by other federal, state or local public agencies, by health insurance, or by employee benefits that are available to the client at the time needed to ensure progress toward the employment outcome on the IPE.

Examples: Pell Grant, Medicaid, private health insurance, Medicare, One-Stop individual training accounts, insurance benefits through Workman's Compensation, free prescription program, family and friends.

These resources **must** be used to meet the costs of vocational rehabilitation services prior to ICBVI expenditures unless their use would:

1. interrupt or significantly delay the progress of the client toward achieving the employment outcome identified in the IPE,
2. jeopardize an immediate job placement, or
3. delay the provision of service to any individual at extreme medical risk.

Student Loans:

ICBVI **cannot** require a client to obtain a student loan as a comparable benefit for participating in a training program. The client may choose to take a student loan to assist with living or other costs.

Scholarships:

Comparable benefits do not include awards and scholarships based on merit, however some scholarships stipulate that they must be used for tuition and school-related expenses. VR Counselor should encourage clients to use any awards or scholarships to assist in their educational endeavors.

GUIDELINES FOR COMPLETING FNA:

ICBVI wants the client to be vested in and to financially participate in the costs of the rehabilitation plan. The FNA is completed to assess the client's monthly budget surplus or deficit.

$$\text{Monthly Income} - \text{Monthly Expenses} = \text{Monthly Surplus or (Deficit)}$$

If surplus, VR Counselor **must** negotiate with client to **use any budget surplus** towards the cost of rehabilitation plan or additional costs associated with participation in rehabilitation plan. This should be noted in RCR. Monthly surplus amount should be used on a monthly basis.

CLIENT FINANCIAL PARTICIPATION:

VR Counselor must always remember to ask your client to financially participate in the cost of the rehab plan. The level of the client's participation in the cost of rehabilitation services must be:

- a) reasonable

- b) based on client's individual need and
- c) not so high as to effectively deny a necessary service.

Use judgment and discretion with your client when completing the FNA, and use reasonable and prudent costs for your locality. VR Counselor may choose to ask for verification of certain expenses.

VR Counselor and client should complete the FNA for up to 12 months. For longer plans, review the FNA annually. If there are any major changes, revise or complete a new FNA.

INCOME:

- ◆ Actual net **monthly** take home pay (wages)
- ◆ Any **consistent monthly** payments coming into the household. For example: SSI, SSDI, TAFI, VA benefits, unemployment benefits, workman's compensation, retirement, private disability, child support, etc.

* On FNA, note types of income and monthly amounts. Add all amounts to get Monthly Income.

AVAILABLE RESOURCES:

These are items that have cash or loan value that can be used towards the rehabilitation plan. Examples of such resources are: savings, stocks and bonds, IRAs, investment real estate, second homes, recreational vehicles (snowmobiles, campers, 4 wheelers) investment items (jewelry, guns, art), additional cars.

When totaling up these available resources, ICBVI will allow a \$5,000 exclusion.

- On FNA, add all Available Resources, subtract the \$5,000 exclusion, then divide the remainder by the number of months in plan. Add this amount to Monthly Income above to get Total Monthly Income. (If number with exclusion is less than 0, put 0).

EXPENSES: (consistent, monthly)

- ❖ Housing (actual cost) including mortgage, rent, trailer space, taxes and insurance for primary residence.
- ❖ Utilities (actual cost within the range \$100-300 per month) including heat, electricity, sewer, trash, water, phone, (cell phone if only phone).

- ❖ If client's cost is higher, then VR Counselor should use discretion and judgment. VR Counselor may want to ask for receipts for documentation of higher costs.
- ❖ Subtract energy assistance subsidy.
- ❖ Food (actual cost, up to \$150 for one person, with \$100 each additional person) includes non-food grocery items.
- ❖ If client's costs are higher because of special diet prescribed by doctor, or other reason, VR Counselor should use discretion and judgment. VR Counselor may want to ask for documentation and receipts.
- ❖ Subtract food stamp/subsidy amount.
- ❖ Miscellaneous including gas, bus tickets, car payment, insurance, medications, medical expenses, clothing, child support, credit cards (minimum monthly payment), etc.

Remember: do not exceed total \$ balance owed when calculating monthly payments for credit cards or other balances owed.

*On FNA, write in monthly amounts and add all amounts to get Total Monthly Expenses.

Choice Items: taxpayers should not subsidize these costs, so don't list them as expenses on FNA. Examples: second home, cabins, boats, recreational vehicles, church tithing, music lessons, horses, cell phones (if not primary telephone), cable TV or any item that is non-income generating.

If VR Counselor has questions on completing the FNA, VR Counselor should consult with the Rehab Services Chief.

ICBVI Comprehensive Assessment and Development of the Individual Plan for Employment (IPE)

Comprehensive Assessment: (completed in Status 10)

The definition of **Comprehensive Assessment** in the Code of Federal Regulations (CFRs) is as follows:

“An assessment of the personality, interests, interpersonal skills, intelligence and related functional capacities, educational achievements, work experience, vocational aptitudes, personal and social adjustments, and employment opportunities of the individual and the medical, psychiatric, psychological, and other pertinent vocational, educational, cultural, social, recreational, and environmental factors that affect the employment and rehabilitation needs of the individual; And may include, to the degree needed, an appraisal of the patterns of work behavior of the individual and services needed for the individual to acquire occupational skills and to develop work attitudes, work habits, work tolerance, and social and behavior patterns necessary for successful job performance, including the use of work in real job situations to assess and develop the capabilities of the individual to perform adequately in a work environment”.

Before an IPE is written, **Comprehensive Assessment** is needed:

- To determine the employment outcome that is selected by the client, with input from the VR counselor, that is consistent with the client’s unique strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice.
- To identify the nature and scope of the vocational rehabilitation services that the client needs to become employed
- To determine how the planned services will assist the client in overcoming the barriers to employment that were identified in the eligibility determination.
- To assess the client’s independent living skills and ability to use the alternative techniques of blindness.

This information will form the basis for the Individualized Plan for Employment (IPE)

The **comprehensive assessment** can include the VR Counselor’s assessment with the client of existing information, independent living skills assessment, vocational exploration, review

of transferable skills, interest testing, aptitude testing, analysis of information from CIS (interests, work values), vocational evaluation, paper and pencil tests, informational interviews with employers, SW work experience, high school assessments and family support of the rehab plan, etc.

The assessment should utilize, to the maximum extent possible, information available from other programs and providers, particularly from SSA and education officials, information provided by the client and the client's family as well as any information on client's use of the alternative skills of blindness available from ICBVI's Home Instructors.

The VR Counselor and the client must conduct a thorough market analysis to include job outlook and client's economic expectations and needs. The goal is for the client to become self-sufficient and self-supporting. Informed client choice is an important part of vocational rehabilitation assessment and planning and requires that the client and the VR Counselor work together to decide on the employment goal and required vocational rehabilitation services.

The following issues need to be addressed in the Comprehensive Assessment and documented in the RCR:

1. Compatibility of disability with employment goal: discuss how the functional limitations of the client's vision loss and any other disabilities impact the client's ability to perform the requirements of the proposed employment.
2. Ability to utilize the alternative skills of blindness and independent living skills which are the precursor for employment. This assessment can be done by the Home Instructor or by the VR Counselor.
3. Skills, interests, aptitudes and abilities, including any transferable skills
4. Market analysis – CIS, available jobs
5. Economic expectations and potential for career growth (e.g. earnings, wages, benefits)
6. Vocational strengths and weaknesses (e.g. interviewing skills, personal hygiene, behavioral issues, work experience, volunteer work, etc.)
7. Client financial issues (i.e. how the client will support self (and family) during the completion of the IPE, especially if it involves long-term training)

8. Informed client choice, including how VR Counselor assisted the client to gather information on possible employment goals and rehabilitation needs and how the decision was made
9. Social and family support
10. Training and academic test results (e.g. Compass test, TABE)

Development of the IPE: (completed in Status 10)

Using the information from the **comprehensive assessment**, the VR Counselor and the client must determine the client's **employment goal** and the **specific vocational rehabilitation services** that are needed to accomplish the goal. Only those services that are **required** should be included on the IPE.

The IPE is a living document that will likely change throughout the life of the client's rehabilitation. The original IPE, developed between the VR Counselor and the client, should be as comprehensive as possible, but may require Amendments as circumstances change and new needs develop.

Individualized Plan for Employment: (completed in Status 10)

Client must:

1. Be an active and full partner in the vocational rehabilitation process.
2. Apply for and secure any Comparable Services or Benefits available

The definition of Comparable Benefits and Services is any benefit or service that exists under any other programs that is available to the client at the time needed to insure the client's progress toward achieving the employment outcome.

Federal regulations require that ICBVI clients must apply for and use any Comparable Services or Benefits that are available to them. Examples: Pell Grant, Medicaid, Medicare, private health insurance, medical indigence programs for medication.

3. Participate in paying for the costs of the plan
4. Make a commitment to co-operate and follow-through with the IPE and achieve an employment outcome.

VR Counselor must:

1. Reinforce that the goal of vocational rehabilitation is employment and that the purpose of the IPE is to assist the client to prepare for, secure, retain or regain employment.
2. Insure that client understands that employment means:
 - a. entering or retaining full-time, or if appropriate, part-time competitive employment in the integrated labor market, including self-employment, telecommuting or small business ownership, or
 - b. Community Supported Employment (CSE), or
 - c. Business Enterprise Program
3. Insure that client is a full and active partner in the development and implementation of the IPE.
4. Inform the client about the four options for writing the IPE:
 - a. by client and VR Counselor together
 - b. by client independently
 - c. by client and representative
 - d. with technical assistance (ICBVI will not pay for t.a.)
5. Assist the client in gathering information, deciding amongst options and making decisions so that the client can make informed choices in the selection of:
 - a. an employment outcome
 - b. specific vocational rehabilitation services **needed** to become employed. This could include low vision services, aids and appliances, rehabilitation technology and IL skills training
 - c. service providers and methods to procure services
6. Assist the client only to the extent that the client needs support and guidance, but not gather information or make decisions for the client, if the client can do these tasks themselves.
7. Staff with the Medical Consultant when there is any medical or surgical treatment recommended to determine the need and best options for treatment. The Medical Consultation should be documented in the RCR.
8. Work with the client to insure that the employment outcome is consistent with the client's unique strengths, resources, priorities, concerns, abilities,

capabilities, interests, economic needs, informed choice and current labor market. This may require review of existing information previously gathered and noted in case file or in the comprehensive assessment.

9. Insure that all Comparable Benefits are utilized before ICBVI funds are expended. Comparable Benefits are any resources available to the client to meet the cost of any vocational rehabilitation services. This does not include awards or scholarships based on merit. Comparable benefits should be noted on the IPE as well as the client's financial participation in the cost of the plan.

ICBVI requires that clients apply for Federal Financial Aid (Pell Grants, Supplemental Educational Opportunity Grants (SEOGs) State Student Incentive Grants (SSIGs) and other grants) **to pay for training costs** i.e. tuition, fees, books and supplies, tools, etc. at any institution of higher education. ICBVI cannot pay for such training costs unless maximum effort has been made to secure grant assistance. This means client must make repayment arrangement if client has previously defaulted on a loan or owes a refund on a grant. A copy of the Financial Aid Award or Denial letter should be placed in client's file before any authorizations are issued.

10. Insure that VR services needed by the client to achieve employment are provided in the most integrated settings.
11. If SSA beneficiary, discuss blind work incentives, PASS Plans and the possible eventual cessation of Social Security benefits.
12. Assess the need for Rehabilitation Technology Services, if and when needed.
13. Complete Financial Needs Assessment (FNA) with client. Regardless of whether client has a surplus or deficit, ask client what he/she is able to financially contribute to the rehabilitation plan. The client needs to be vested in and committed to the success of his/her rehabilitation plan.
14. Insure that the IPE is developed and implemented in a timely manner, within **six (6) months** of the date of the eligibility determination.

An **exception may be made**, and must be documented in the RCR, if this timeframe will be exceeded due to the needs of the individual client. The documentation should include the timeframe for the extension and the reasons for the extension. Guidelines for exceptions include client readiness, client availability, unable to complete comprehensive assessment to determine scope

of needed VR services, and unforeseen delays outside the control of VR Counselor.

15. Complete the IPE for all School Work Transition clients before they exit the school system.

VR counselors should include in the IPE all transition services that are being provided by the school before the client leaves school as well as any services ICBVI is or will be providing to the client.

16. Complete any additional forms, as needed, e.g. OJT Agreement, Tool Agreement.
17. Review Client Rights and Responsibilities with client at completion of IPE.
18. Insure IPE is fully completed, agreed to and **signed** by the client, or by the parent/guardian if client is under age 18.
19. **APPROVE and sign the IPE.** The approval of the IPE is the responsibility of the qualified ICBVI VR Counselor. Plan approval and/or consultation with the Rehabilitation Services Chief may be a necessary step, depending on the VR Counselor's knowledge of vocational rehabilitation and credentials.

After the plan is signed and approved, move case into Status 12

20. Provide client with a copy of the signed and approved IPE.
21. Review client's progress towards the employment outcome on an ongoing basis and complete an Annual Review of the IPE at least once a year. If the IPE does not last for 12 months, then an Annual Review is not required.
22. Complete IPE Amendments, as needed.

An IPE Amendment is **required:**

- when a new employment goal is chosen
- there are major changes in the planned services
- there are major costs (over \$1000) for a new service

Amendments need to be approved and signed by the client and the VR Counselor and documented in the RCR.

An IPE Amendment is not required:

- when the cost of a service changes, as this will be shown on the authorization
- when additions are needed for an already approved service, e.g. 10 more hours of job coaching, 1 more semester of college
- for a no-cost service or one paid by comparable benefits or by the client
- when more time is needed to complete the services

ICBVI Independent Living Skills Assessment

Client:

Date of Appraisal:

Rehabilitation Teacher/Counselor:

1.) Orientation and Mobility

How do you get around in your home, neighborhood and community?

Are there any particular situations such as stairs or street crossing that cause you difficulty?

2.) Home management

How do you prepare meals for yourself an/or family?

Are there particular types of foods or meals that you no longer prepare because of your vision loss?

Are there any appliances in your home that you no longer use?

How do you do your grocery shopping?

How are you doing basic household cleaning such as vacuuming, sweeping, or dusting?

How do you do your laundry?

Are you able to do minor clothing repair?

What are you using to tell time?

Are you able to use the telephone? Phone book?

How do you identify your money?

3.) Communications

How are you handling written communication such as your mail, bills, checking account, etc?

Are you currently using any magnifying devices to read print material?

What is your computer experience?

Are you still able to use your computer? Is so, what for?

4.) Health management

How do you dispense medication for yourself and/or family?

If diabetic, how are you doing injections, testing blood, etc.?

Do you have any other health concerns that you feel may limit you in performing any of the tasks that we've discussed previously?

Additional comments and recommendations:

ICBVI Vocational Rehabilitation Services (Status 18)

Vocational rehabilitation services are any services described in the Individualized Plan for Employment (IPE) which are necessary to assist an eligible client in preparing for, securing, retaining or regaining an employment outcome that is consistent with the strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice of the client, including:

- (1)** Assessment for determining vocational rehabilitation needs by qualified personnel, including, if appropriate, an assessment by personnel skilled in rehabilitation technology
- (2)** Counseling and guidance, including information and support services to assist the client in exercising informed choice
- (3)** Interpreter services provided by qualified personnel for clients who are deaf or hard of hearing, and reader services for clients who are blind or visually impaired
- (4)** Job-related services, including job search and placement assistance, job retention services, follow-up services, and follow-along services
- (5)** Maintenance for additional costs incurred while participating in an assessment for determining eligibility and vocational rehabilitation needs or while receiving services under an Individualized Plan for Employment
- (6)** Occupational licenses, tools, equipment, and initial stocks and supplies

A Tool Agreement is required when purchasing an item that costs over \$300.

- (7)** Other goods and services determined necessary for the client to achieve an employment outcome
- (8)** Personal assistance services on the job provided while the client is receiving other vocational rehabilitation services
- (9)** Physical and mental restoration services, to the extent that financial support is not readily available from a source (such as through client's health insurance or through comparable services and benefits such as Medicaid, Medicare), including:
 - Corrective surgery or therapeutic treatment that is likely, within a reasonable length of time, to correct or modify substantially a stable or slowly progressive physical or mental impairment that constitutes a substantial impediment to employment

- Diagnosis of and treatment for mental and emotional disorders by qualified personnel who meet State licensure laws
- Dentistry
- Nursing services
- Necessary hospitalization (either inpatient or outpatient care) in connection with surgery or treatment and clinic services
- Medication and medical supplies
- Prosthetic and orthotic devices
- Eyeglasses and visual services, including visual training, the examination and services necessary for the prescription of eyeglasses, contact lenses, microscopic lenses, telescopic lenses or bioptics, aids and appliances and any other special visual aids prescribed by qualified personnel
- Podiatry
- Physical therapy
- Occupational therapy
- Speech or hearing therapy
- Mental health services
- Treatment of either acute or chronic medical complications that are associated with or arise out of the provision of physical or mental restoration services, or are inherent in the condition under treatment
- Special services for the treatment of clients with end-stage renal disease
- Other medical or medically related rehabilitation services

Consultation with the Medical Consultant is recommended for clarification of medical issues or proposed treatment.

(10) Post-employment services necessary to assist the successfully rehabilitated client to retain, regain, or advance in employment

(11) Referral and other services to assist clients to secure needed services from other agencies if such services are not available under the Rehabilitation Act, as amended, including the Statewide Workforce Investment System, the State Independent Living Council and Independent Living Centers, American Indian programs, general Vocational Rehabilitation program, Social Security Administration or any other local, state or federal program

(12) Rehabilitation instruction in independent living skills and the alternative skills of blindness to include: orientation and mobility, activities of daily living, Braille, computer skills and use of adaptive technology and pre-vocational work readiness for clients who are blind or visually impaired

(13) Rehabilitation technology, including telecommunications, sensory, and other technological aids and devices

A Tool Agreement is required when purchasing an item that costs over \$300, e.g. Braille Note, computer, screen reader, CCTV or other adaptive equipment.

(14) Services to the family of an eligible client necessary to assist the client to achieve an employment outcome

(15) Supported employment (CSE) services are provided in a community-based setting with the client learning the job tasks at the job site. CSE is for clients who traditionally would have been viewed as too severe to benefit in terms of an employment outcome and who require ongoing long-term support to remain employed.

(16) Technical assistance and other consultation services to conduct market analyses, develop business plans, and otherwise provide resources to eligible clients who are pursuing self-employment or telecommuting or establishing a small business operation or Business Enterprise Program as an employment outcome

(17) Transition services for students with disabilities, that facilitate the achievement of the employment outcome identified in the Individualized Plan for Employment

(18) Transportation, including adequate training in the use of public transportation vehicles and systems that is provided in connection with the provision of any other vocational rehabilitation service and needed by the client to achieve an employment outcome

(19) Vocational and other training services, including the provision of personal and vocational adjustment services, on-the-job training, books, tools, and other training materials, except that no training services provided at an institution of higher education shall be paid for with funds under the Rehab Act unless maximum efforts have been made by the agency and the client to secure grant assistance from other sources to pay for such training

Training can include the following:

- Academic – post high school education in a university or college setting leading to an Associate, Baccalaureate or higher degree
- Technical Associate Degree - post high school education, consisting of a combination of basic academic and technical courses leading to an associate degree

- Trades and Vocational – specific job skill training in area of trades or vocational field, usually leading to licensure or certificate

Clients will be expected to carry a full course load of 12 – 16 credits per semester, except for the first semester where some remediation may be necessary. Remember, ICBVI is preparing clients for full-time competitive employment, if possible.

An exception can be made for disability related issues or courses that may pose special difficulties to blind or visually impaired clients, such as math

- Other Academic (Elementary or High School) – academic training on a secondary level or lower to include GED or high school equivalency.
- Business – specific job skill training in business courses, usually leading to a certificate
- On-the-Job-Training (OJT) – provided by the employer, the client works and is paid while learning technical skills on the job

The VR Counselor must negotiate the OJT fees based on the employer's cost to train the client and the level of technical skills required for the job. Negotiations should include the cost of training and the length of training time required (# of months).

VR Counselors are encouraged to negotiate a decreasing payment schedule with the employer as the client learns the job skills, and also so that the employer does not rely on a regular monthly training fee.

- Personal and Vocational Adjustment or Job Coaching – skill training or behavioral adjustment to assist client to learn job skills, social skills and work habits. Services can be provided by a Community Rehabilitation Program (CRP) or by the ICBVI VR Counselor. These services mostly provided in a community based setting.
- Miscellaneous - any other training, including self-employment, telecommuting, small business ownership or Business Enterprise Program.

All clients in Service Status need to be monitored periodically to insure that they are making satisfactory progress toward their employment goal.

e.g. If a client is attending college, then contact could be at mid-term and at the end of the semester

e.g. If client is in an OJT, Community Rehabilitation Program (CRP) or at the Assessment and Training Center (ATC), then contact could be monthly

The frequency of contact will depend on the client and the type of services on the IPE, but contact with the client must be maintained on a regular basis and documented in the RCR.

If the client is not progressing satisfactorily, then the VR Counselor and the client will need to reassess the employment goal and VR services.

ICBVI Employment (Status 22)

This status is to be used when the client enters employment that is directly related to the employment outcome on the IPE and follows the provision of vocational rehabilitation services.

Employment outcome means:

1. Entering or retaining full-time or, if appropriate, part-time competitive employment in the integrated labor market.

Or

2. For Community Supported Employment (CSE), entering or retaining competitive work in an integrated work setting, or employment in integrated work setting in which clients are working toward competitive employment.

Or

3. Any other vocational outcome including self-employment, telecommuting, business ownership, Business Enterprise Program, homemaker or unpaid family worker.

If the client works more than one part-time job, after the provision of vocational rehabilitation services, combine the number of hours worked and the wages paid.

If the client changes employers but the type of occupation remains the same or similar, update the employer information in ICMS and continue counting the 90 day period of employment.

If the client loses the job, you may leave the client in status 22 for up to 30 days while seeking other employment, unless new services need to be provided and then the client would return to Service Status.

If there is a gap in employment between jobs, VR Counselor must add this time to the 90 day period so that when a case is closed rehabilitated, the client has actually worked for a minimum of 90 calendar days (including weekends).

VR counselor must:

1. Insure that the placement is appropriate as it relates to:
 - physical or mental impairment (disability)

- economic needs of the client and need for benefits
 - employer's needs
 - potential for career growth, based on client's capabilities.
2. Insure that client is involved in informed decision making regarding the job placement.
 3. Contact the employer at the job-site or by phone, unless client specifically requests no employer contact (i.e. if client got his/her own job and didn't inform the employer about the disability or ICBVI).
 4. Contact the employer at the job-site or by phone when client is placed by a Community Rehabilitation Program (CRP) so employers know what ICBVI is and how ICBVI may assist, if needed.
 5. Follow up with client regarding job related issues, to assist the client to maintain employment.

ICBVI Interrupted Services (Status 24)

This status is used when vocational rehabilitation services are interrupted either for disability-related or other reasons.

To assist with client's continuation towards an employment goal after an interruption in services, the VR Counselor needs to maintain communication with the client and actively involve the client in reassessment, if needed, and then the planning and initiation of strategies to resume employment oriented activities.

When the client has been in Status 24 for six months, a decision needs to be made to either close the file or provide services to move forward again towards employment.

ICBVI Case Closure (Status 08)

Closure status 08 is used to close a file from status 02 or 06, prior to eligibility or if the client is not eligible. This closure may be used after Trial Work Experience (TWE) or Extended Evaluation (EE).

VR Counselor must determine and document if client does not meet the eligibility criteria or if the file is being closed for administrative reasons.

If the file is being closed because the client **does not meet the following eligibility criteria:**

1. No documented evidence of legal or functional blindness, no documented physical or mental impairment (disability).
2. Documented disability is not an impediment (barrier) to employment.
3. Does not require VR Services to prepare for, secure, retain or regain employment.
4. Cannot benefit in terms of an employment outcome.

The Certificate of Ineligibility must be completed and provided to the client,

then the **Closure Reason** will be one of the following:

- 02 Disability too significant to benefit from VR services
 Use this code to identify an individual whose mental or physical disability is so significant that the individual cannot benefit from VR services in terms of employment.
- 08 No disabling condition
 Use this code only for applicants who are not eligible for VR services because no physical or mental impairment exists, such as when the reported disability is an acute condition with no residual impairment, e.g., a broken bone that heals.
- 09 No impediment to employment
 Use this code for applicants who are not eligible for VR services because their physical or mental impairment does not constitute a substantial impediment to employment.

11 Does not require VR services

Use this code for applicants who do not require VR services to prepare for, enter into, engage in, or retain gainful employment consistent with their strengths, resources, priorities, concerns, abilities, capabilities, and informed choice.

13 All other reasons

If the file is being closed for **administrative reasons**, no Certificate of Ineligibility is required and the **Closure Reason** will be one of the following:

01 Unable to locate or contact; moved

Use this code when the individual has moved without a forwarding address or is otherwise unavailable. Also use this code for persons who have left the State and show no intentions of continuing in their VR program.

03 Refused services or further services

Use this code for individuals who choose not to participate or continue in their VR program at this time.

04 Death

05 Individual in institution

Use this code when an individual has entered an institution and will be unavailable to participate in a VR program for an indefinite or considerable period of time. An institution includes a hospital, a nursing home, a prison or jail, a treatment center, etc.

06 Transferred to another agency

Use this code when an individual needs services that are more appropriately obtained elsewhere. Transfer to the other agency indicates that appropriate referral information is forwarded to the other agency so that agency may provide services more effectively. Include individuals transferred to other State VR agencies.

07 Failure to cooperate

Use this code to indicate when an individual's actions (or non-actions) make it impossible to begin or continue a VR program. Failure to cooperate includes repeated failures to keep appointments for assessment, counseling, or other services.

- 10 Transportation not feasible or available
Use this code to indicate that the individual was unable to accept or maintain employment because suitable transportation was either not feasible or not available.
- 12 Extended services not available
Use this code for individuals who would have benefited from the provision of supported employment services but for whom no source of extended services was available.
- 14 Extended employment
Use this code for individuals who received services and were placed in a non-integrated setting for a public or non-profit organization.

The Closure Reason “All Other Reasons” is only to be used when VR Counselor is unable to use any of the above listed reasons.

VR Counselor must:

- 1) Summarize case activity, including vocational guidance and counseling, in RCR.
- 2) Complete and sign Closure Checklist which includes:
 - a) Opportunity for full consultation with client regarding case closure and closure reason.
 - b) Client notification of case closure and closure reason, **in writing**.
 - c) Client informed of rights of appeal, including mediation and availability of CAP.
 - d) Certificate of Ineligibility completed for closure reasons 02, 08, 09, 11 and 13 and a copy provided to client..
 - e) Referral to other sources, if needed.
 - f) All authorizations brought to zero balance.
 - g) ICMS updated with closure information.

For Case Closure from TWE or EE (Status 06), VRC must also:

- 1) Complete and sign closure plan, and provide copy to client.

ICBVI Case Closure (Status 30)

Closure status 30 is used to close a file from status 10 or 12. It means that the client was determined eligible but either an IPE was not developed or not initiated.

VR Counselor must:

- 1) Determine and document reason for case closure, using one of the following reasons:
 - 01 Unable to locate or contact; moved
 - 02 Disability too significant or unfavorable medical prognosis
 - 03 Refused services or further services
 - 04 Death
 - 05 Individual in institution
 - 06 Transferred to another agency
 - 07 Failure to cooperate
 - 10 Transportation not feasible or available
 - 12 Extended services not available
 - 13 All other reasons
 - 14 Extended employment
- 2) Summarize case activity, including vocational guidance and counseling, in RCR.
- 3) Complete and sign Closure Checklist which includes:
 - a) Opportunity for full consultation with client regarding case closure and closure reason.
 - b) Client notification of case closure and closure reason, **in writing**.
 - c) Client informed of rights of appeal, including mediation and availability of CAP.
 - d) Certificate of Ineligibility completed for closure reasons 02 or 13 and a copy provided to client.
 - e) Referral to other sources, if needed.
 - f) All authorizations brought to zero balance.
 - g) ICMS updated with closure information.
 - h) Closure plan completed and signed, and copy provided to client if the IPE was developed.

ICBVI Case Closure (Status 28)

Closure status 28 is used to close a file from status 18 or 24. It means that the client was determined eligible, the IPE was developed and initiated, but the file is being closed unsuccessfully as an employment outcome is not achievable.

VR Counselor must:

- 1) Determine and document reason for case closure, using one of the following reasons:
 - 01 Unable to locate or contact; moved
 - 02 Disability too significant or unfavorable medical prognosis
 - 03 Refused services or further services
 - 04 Death
 - 05 Individual in institution
 - 06 Transferred to another agency
 - 07 Failure to cooperate
 - 10 Transportation not feasible or available
 - 12 Extended services not available
 - 13 All other reasons
- 2) Summarize case activity, including implementation of planned services and vocational guidance and counseling, in RCR.
- 3) Complete and sign Closure Checklist which includes:
 - h) Opportunity for full consultation with client regarding case closure and closure reason.
 - i) Client notification of case closure and closure reason, **in writing**.
 - j) Client informed of rights of appeal, including mediation and availability of CAP.
 - k) Certificate of Ineligibility completed for closure reasons 02 or 13 and a copy provided to client.
 - l) Referral to other sources, if needed.
 - m) All authorizations brought to zero balance.
 - n) ICMS updated with closure information.
 - o) Closure plan completed and signed, and copy provided to client.
 - p) Tools covered by tool agreement repossessed and documented.

ICBVI Case Closure Rehabilitated (Status 26)

Closure status 26 is used to close a file successfully rehabilitated. It means an eligible client has achieved an employment outcome following the provision of vocational rehabilitation services under an IPE.

Most rehabilitation closures are in **competitive**, integrated **employment**, including Self-Employment, Business Enterprise Program and Community Supported Employment (CSE). Two exceptions are allowed but seldom used: Homemaker and Unpaid Family Worker.

1. For a VR client to be successfully rehabilitated, the client must have attained competitive employment in an integrated setting, and be compensated at or above minimum wage.

The federal definitions are as follows:

Employment Outcome:

Entering or retaining full-time or, if appropriate, part-time competitive employment in the integrated labor market, supported employment, or any other type of employment in an integrated setting, including self-employment, telecommuting, or business ownership, that is consistent with an individual's strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice.

Competitive Employment:

Work in the competitive labor market that is performed on a full-time or part-time basis in an integrated setting; and for which an individual is compensated at or above minimum wage, but not less than the customary wage and level of benefits paid by the employer for the same or similar work performed by individuals who are not disabled.

Integrated Setting:

With respect to an employment outcome, a setting typically found in the community in which clients interact with non-disabled individuals, (excluding service providers), to the same extent that non-disabled individuals interact with other people in comparable positions.

2. For **Supported Employment** rehabilitation, the client must have attained competitive employment, in an integrated setting, with ongoing supports and be compensated at or above minimum wage.

A client is considered to be in “supported employment” as long as they are receiving ongoing support services while working in an integrated setting while progressing or moving towards competitive employment and the minimum wage level. However, the CSE client cannot be considered to have achieved a competitive employment outcome until the client is earning at least minimum wage.

3. **Homemaker** refers to individuals whose activity is keeping house for persons in their household or themselves if they live alone.

The non-competitive occupation of homemaking may be the most appropriate vocational objective for a client, but there are certain criteria that must be met:

- Substantial services can be provided by ICBVI which will materially contribute to the client’s adjustment or ability to function in this occupation.
- It is anticipated that the improved level of functioning will enable the client to make a significant contribution to the household by participating in work activities in the home or family situation, for example: taking care of minor children. The client must perform the work activities to qualify as a homemaker.
- As a result of the improved level of function and the work activity performed by the client, socio-economic benefits may be realized.
- Self-care activities are not sufficient to meet the definition of homemaker. **Self-care activities** are related to the person’s direct physical needs such as hygiene, dressing and mobility. **Homemaking activities** are concerned with maintaining a suitable living environment, which includes meal preparation, baking, serving meals, washing dishes, marketing, child care, bed making, laundry, washing and hanging clothes, ironing and cleaning.

4. **Unpaid Family Worker** refers to individuals who work without pay on a family farm or in a family business.

Additionally, the following requirements must be met:

- The client has achieved the employment outcome described in the IPE.
- ICBVI must have provided substantial services to the client. ICBVI does not have to pay for services for them to be considered substantial. They may be provided by the VR counselor, by another agency or CRP or as a comparable benefit.

Substantial means that the client could not have achieved the employment outcome with ICBVI assistance even if other services were being provided by other agencies or comparable benefits. ICBVI must have been critical to the client's success.

- The employment outcome is consistent with the client's strengths, abilities, interests, economic needs and informed choice.
- The client has maintained the employment outcome for an appropriate period of time, but not less than 90 days, necessary to insure the client's stability on the job and no longer needs vocational rehabilitation services.
- The client and the VR Counselor consider the employment outcome to be satisfactory and agree that the client is performing well in employment.
- The client has been informed about the availability of Post-Employment Services (PES).

VR Counselor must:

- 1) Document in ICMS:
 - a) Job title
 - b) Number of hours worked per week
 - c) Wages and benefits
 - d) Employer name
 - e) Supervisor's name and phone number
 - f) VRC contact with employer, either at job site or by phone, unless client specifically requests no employer contact (i.e. if client got his/her own job and didn't inform employer about disability or ICBVI).
 - g) Potential for career growth, based on client's capabilities.
- 2) Complete and sign closure checklist which includes:
 - a) Opportunity for full consultation with client regarding case closure and closure reason.
 - b) Client notification of case closure and closure reason, **in writing**.
 - c) Client informed of rights of appeal, including mediation and availability of CAP.
 - d) If SSA beneficiary, discussion of decrease or possible cessation of benefits as well as blind work incentives including PASS Plans.
 - e) All authorizations brought to zero balance.
 - f) ICMS updated with closure information.

- g) Closure plan completed and signed, and copy provided to client.
 - h) Tools covered by tool agreement released to client or repossessed and documented.
 - i) Need for Post Employment Services discuss
- Client Name

Client Name: _____

I. 08 Closure from status 02 or 06

- Client given the opportunity for full consultation regarding case closure and closure reason
- Client notified of case closure and closure reason **in writing**
- Client informed of rights of appeal including mediation and availability of CAP
- Certificate of Ineligibility completed for closure reasons 02, 08, 09, 11 or 13
- Client referred to alternative resources:

- ICMS updated with closure information
- Closure plan completed and signed (06 to 08 only).

II. 28 or 30 Closures

- Client given the opportunity for full consultation regarding case closure and closure reason
- Client notified of case closure and closure reason **in writing**
- Client informed of rights of appeal including mediation and availability of CAP
- Certificate of Ineligibility completed (closure reasons 02 or 13)
- Client referred to alternative resources:

- ICMS updated with closure information
- Annual review of IPE (and amendments) conducted and documented (if IPE was initiated)
- Closure plan completed and signed (if IPE was completed)
- Tools covered by tool agreement repossessed and documented

III. 26 Closure

- Client given the opportunity for full consultation regarding case closure and closure reason
- Client notified of case closure and closure reason **in writing**
- Client informed of rights of appeal including mediation and availability of CAP
- If SSA beneficiary, discussed decrease or possible cessation of benefits as well as blind work incentives including PASS Plan
- ICMS updated with closure information

- Annual review of IPE (and amendments) conducted and documented
- Closure plan completed and signed
- Tools covered by a tool agreement released to client Yes No
- Need for Post-Employment Services discussed

VR Counselor Signature

Date

ICBVI Post Employment Services (PES) (Status 32)

The purpose of Post Employment Services is to assist a previously rehabilitated client to retain, regain or advance in employment.

To utilize Post Employment Services, the VR Counselor must:

1. Verify that the client is a previous 26 closure.
2. Decide if the client's employment needs are relatively minor in scope and duration. This means that the client only needs a couple of relatively small VR services, and that they probably won't last more than a short period of time.
3. Post Employment Services may include any VR service or combination of services needed for the client to retain, regain or advance in employment that are minor in scope and duration.
4. If the client requires comprehensive VR services that will probably take a substantial time to complete, a new VR file should be opened, eligibility determined and IPE written based on current barriers created by the disability or disabilities, and needed vocational rehabilitation services. A new file should also be opened if the client has acquired additional disabilities that will require VR services.

ICBVI

Social Security Administration (SSA)

Ticket to Work and Reimbursement Tracking

When ICBVI VR counselors assist Social Security beneficiaries to enter employment and their wages are above Substantial Gainful Activity (SGA) dollar amounts, then ICBVI can claim to SSA for the reimbursement of case costs. This includes both the direct client service dollars and the agency and counselor costs, calculated according to the SSA-RSA Cost Formula.

ICBVI must track clients who go to work to insure that they continue to work for 9 consecutive months or 9 out of the next 12 months, earning above SGA. The SGA amount for statutorily blind individuals is much higher than that for other disabilities and consequently harder to achieve, so ICBVI has few claims, however the reimbursement amounts can also be high per client.

SGA amounts are determined annually by SSA and are as follows:

Effective 1/1/2005, SGA for blind is \$1380 per month and \$830 for other disabilities.

Effective 1/1/2006, SGA for blind is \$1450 per month and \$860 for other disabilities.

Effective 1/1/2007, SGA for blind is \$1500 per month and \$900 for other disabilities.

Since the enactment of the SSA Ticket to Work and Work Incentive Improvement Act of 1999 and the subsequent state roll-out to Idaho in 2003, ICBVI counselors are required to have the client assign their Ticket to ICBVI to get the reimbursement either on a Cost Reimbursement basis, which we have used historically, or under the new Milestone Outcome Payment Method.

Procedure for tracking and reimbursement:

1. At Application, ask if client is receiving SSI or SSDI benefits and the amount and secure verification.
2. When the IPE is developed, to have the client assign their ticket to ICBVI, the VR counselor must complete and sign the SSA Form 1365 and have the client sign it as well. This needs to be done for all clients who have the capacity to reach an earnings level of SGA or above. (see attached)
3. The SSA 1365 and a copy of the signed IPE must be faxed to Maximus at (703) 683-3289. Maximus will then send a letter to ICBVI assigning the Ticket to

the agency. (see attached)

4. When the client enters employment, Status 22, the VR counselor must send an email to Trina, Financial Technician in Boise. Trina will then enter a delayed email into the computer system that will be delivered in 8 months from the start date of client's employment. This will serve as a reminder to both the VR counselor and the Financial Technician that the client's 9th work month is approaching.
5. The Financial Technician then sends the SSA Reimbursement form to the VR counselor to be completed and to get the client's and the employer's signature, verifying the employment and the wages paid. This form is returned to the Financial Technician who then completes the paperwork for reimbursement and submits it to SSA. (see attached)
6. When SSA processes the reimbursement, the check is sent to ICBVI. Occasionally SSA adjusts the amount of the reimbursement, but an explanation accompanies the check. If this explanation is not clear, the ICBVI will contact SSA for further details.
7. An electronic tracking system will be built into our computer system after we have migrated to a web-based system, as our current system is not able to handle this.

TO:

FROM: Trina Ayres
Financial Technician

RE: SSA Reimbursement

Client:

SSN:

Case No:

Return to Accounting

In order to determine reimbursable status, the following questions must be answered:

1. (a) Has the client completed a minimum of nine months of continuous employment, or nine of the last 12 months? Yes or No (please circle one)
- (b) If employed nine of the last 12 months, please state circumstances surrounding the interruption of continuous work and the beginning date that continuous work started.

2. Did the client earn the SGA amount of \$1450 per month after 01/01/06 or more during the entire period? Yes or No (please circle one). **If no, please state when date of SGA began.** _____

Continue ONLY if the answers to questions 1 and 2 are positive.

3. Were medical services provided, initiated or coordinated under an IWRP?

Comments:

4. Is the Social Security number accurate? Yes or No (please circle one). If no, please provide correct Social Security number: _____
5. Was client receiving SSI and/or SSDI? (please circle.)
6. On what date was the IPE signed? _____
7. Please have the client certify work months and wages and employer's work verification by having the attached document signed. Please ensure the client's statement of earnings agrees with question 2.

Person Completing Form: _____

Signature

THANK YOU FOR YOUR ASSISTANCE!

TO: IDAHO COMMISSION FOR THE BLIND AND VISUALLY IMPAIRED

I hereby certify that I have worked for none (9) continuous months or at least nine (9) months of the 12-month period beginning _____ and that I have earned at least \$ _____ per month each and every month worked. The months I worked are _____, _____, _____, _____, _____, _____, _____, _____, and _____. I did not work the month (s) of _____, _____, or _____ because _____.

Position title: _____

Client Signature _____

Address _____

City _____ State _____ Zip _____

EMPLOYER VERIFICATION

(Client) _____ is employed by my company and the above information is correct to the best of my knowledge.

Company Name _____

By: (Signature) _____

Telephone Number _____

ICBVI School Transition Services

ICBVI participates in student transition planning as outlined in the Rehabilitation Act, its Amendments and the Code of Federal Regulations. The purpose of transition is to identify and link students and their families to post-secondary community services and supports or programs **before** the student graduates.

Both the Rehabilitation Act and the Individuals with Disabilities Education Act (IDEA) use the same definition of transition services:

A coordinated set of activities for a student designed within an outcome oriented process that promotes movement from school to post-school activities including post secondary education, vocational training, integrated employment (including supported employment), continuing and adult education, adult services, and independent living or community participation.

The coordinated set of activities must be based upon the individual student's needs, taking into account the student's preferences and interests, and must include instruction, community experiences, the development of employment and other post-school adult living objectives, and, if appropriate, acquisition of daily living skills and functional vocational evaluation.

Transition services must promote or facilitate the achievement of the employment outcome identified in the student's Individualized Plan for Employment

It is the school's responsibility is to provide a free and appropriate education to all students. This includes instructional aids, devices, and necessary services to achieve educational goals and for costs associated with transitioning services such as community placements, on-the-job training, vocational evaluations, and independent living skills classes.

ICBVI may assist with the costs associated with vocationally relevant summer transition activities, such as SWEP or BRIDGE. ICBVI may also provide assistance with assistive technology that the client will need when he/she exits the school system and transitions into higher education or employment.

It is the responsibility of the Counselor; the student/guardian and school personnel to explore shared funding options between ICBVI and the local education agency.

VR Counselor must:

1. Outreach to school personnel and identify students who are blind or visually impaired and in need of transition services.
2. Provide information on purpose of vocational rehabilitation, application procedures, eligibility requirements and the scope of services that may be provided.
3. The student's application for ICBVI will usually be taken by age 16 or when the student is within two years of exiting the school system, however it may be taken as early as age 14 if vocational planning is felt to be necessary at that point.
4. With the student (and parents, if student is under age 18), develop and approve the Individualized Plan for Employment (IPE) as early as possible during the transition planning process, but at the latest **before** the eligible client leaves the school setting.
5. Participate in transition planning that facilitates the development and completion of the student's Individualized Education Program (IEP). Attend the IEP meetings at the invitation of the student and the school.
6. Retain a copy of the IEP in the ICBVI case file
7. Consult with and provide technical assistance to school personnel in planning for the transition from school to post-school activities, including vocational rehabilitation, of students who are blind or visually impaired.