

Vocational Rehabilitation Fee Schedule
Draft OAC 3304-2-52 Language
Changes Affected by Stakeholder Feedback
Feedback Received: April 25, 2016 through September 7, 2016

Opportunities for Ohioans with Disabilities (OOD) contracted with Public Consulting Group (PCG) to recommend cost informed rates for the Vocational Rehabilitation Fee Schedule. Stakeholders were given various opportunities and formats to submit questions and comments for consideration since PCG issued their first draft rate proposal on April 25, 2016. Formats for receipt of feedback ranged from regional forums, to submission in writing to the provider management program mailbox, through Stakeholder Associations meeting directly with either the OOD Executive or Senior Staff.

There have been various adjustments made by OOD, from the original draft of the VR Fee Schedule to the finalized version dated October 28, 2016. This document outlines changes to the fee schedule affected by stakeholder feedback.

Original Version	Stakeholder Feedback	Final Version
Consumer Price Index	CPI is not the appropriate economic indicator to adjust for as it reflected deflation in Ohio during a time that providers experienced increases in wage and health insurance costs. The Employer Cost Index is a more applicable indicator to apply as it is reflective of these costs.	OOD increased the rates by applying the Employer Cost Index to the rates to reflect the increase in the cost of labor to providers.
15 Day Billing Cycle	It may be difficult for providers to meet the requirement to submit bills within 15 days and to submit corrections to denied bills within 15 days.	OOD adjusted to a 21 Calendar Day Billing Cycle. OOD's review of 124,865 authorizations received after 10/1/15 shows the median duration between last date of actual service and invoice date was fifteen (15) calendar days. The average duration was 21.75 calendar days.
Performance Based Job Development (PBJD)	Rates for PBJD do not cover the cost for the provider when placing individuals with the most significant disabilities.	OOD added Performance Based Job Development - Supported Employment Rates and definitions. These rates are higher than the standard

		rate to account for the more intensive services provided.
Training Stipend	The 5% adjustment may not cover all of the expenses associated with this requirement. At a minimum the fee needs to cover workers compensation and FICA expenses.	OOD increased the 5% adjustment to a 15% adjustment and will be creating a standardized template for invoicing the training stipend.
Site Development	How will OOD compensate providers for the time involved with meeting a potential participant prior to agreeing to create a Community Based Assessment (CBA) or Work Adjustment (WA) site for the participant?	OOD made adjustments to the service definitions for CBA/WA to allow providers to bill for Site Development.
Flat Rates for CBA/WA	Individuals have multiple reasons why they need to work less than a 4 hour or 7 hour day which is oftentimes outside of the providers' control.	OOD clarified that the flat fee rates allow for payment up to the threshold of 4 or 7 hours. The number of hours will be determined by the OOD counselor based upon the needs of the individual being served and the employer who is hosting the service.
Work Incentives Coordination/Planning	The rate proposed by OOD is low and the staff who perform this service will generally have specialized training and credentialing.	OOD created a 2 tiered rate to allow higher compensation for credentialed providers.

<p>Mileage - Limited Provider Availability</p>	<p>Providers who represent large territories due to limited availability of providers for services in Orientation and Mobility; Activities of Daily Living, Rehabilitation Technology, Low Vision Services, Home Modification and Vehicle Modification are not compensated for travel which can sometimes be 3 to 5 hours of a work day for 1 direct hour of service.</p>	<p>OOD extracted these specialized services from the Fee Schedule and will contract with these providers. This will ensure that there continues to be statewide coverage for these services for all 88 counties.</p>
<p>Mileage - All other Providers</p>	<p>Providers of core, Auxiliary and Miscellaneous VR services will not be compensated for mileage.</p>	<p>The cost of mileage was incorporated into the overall rates for services. OOD has included a new rate in the fee schedule for a Service Area Modifier (SAM) to be utilized in instances where OOD requests that a provider travel beyond their designated counties of service to provide a service to an individual.</p>
<p>Summer Youth Curriculum</p>	<p>OOD only allows the Skills to Pay the Bills curriculum currently. Will OOD consider new curriculums?</p>	<p>OOD will consider other curriculums for summer youth educational requirements. The curriculums would need to be pre-approved by OOD and will then be added to a pre-approved list that Providers must choose from.</p>
<p>Job Development Incentives</p>	<p>How and when will incentives be paid for job development?</p>	<p>OOD has created Premium Retention Rates for Tier 3 under Performance Based Job Development and Supported Employment. When an individual is placed quickly and/or with wages above SGA, the provider will receive the appropriate Tier 3 payment as defined in the VR Fee Schedule.</p>