




Title:	Vocational Rehabilitation Case Closure
Policy #:	80-VR-02
Legal Reference:	34 CFR 361.5, 361.37, 361.41, 361.42, 361.43, 361.44, 361.47, 361.48, 361.55, 361.56, OAC 3304-2—56, 3304-2-59, 3304-2-61
Date:	February 18, 2019
Approved:	Kevin L. Miller, Executive Director 
Origin:	Bureau of Vocational Rehabilitation and Bureau of Services for the Visually Impaired
Supersedes:	80-VR-02 (05/08/17))
History:	80-VR-02 (04/07/14), VRP-0300 (04/03/07 and versions prior to 4/03/07) and any other guidance issued for case closure
Review/ Implementation	Begin Review – 05/01/2019 Implement revisions By – 11/4/2019

I. AUTHORITY

This policy is issued in compliance with Ohio Revised Code (ORC) §3304.15 which establishes the power and authority of the Opportunities for Ohioans with Disabilities (OOD) and its executive director to develop all necessary rules and policy in furtherance of its statutory duties.

II. PURPOSE

The purpose of this policy is to provide direction for closing a vocational rehabilitation case in accordance with Section 102 of the Workforce Innovation and Opportunities Act and appropriate federal (i.e. Code of Federal Regulations [CFR]) and state law (i.e. Ohio Revised Code [ORC], Ohio Administrative Code [OAC]), Governor directives and executive orders, other governing agency (e.g. DAS, OBM) policy or guidance, and/or Executive Director expectations.

III. APPLICABILITY

This policy applies to VR Staff and VR Contractors.

IV. DEFINITIONS

Refer to “Vocational Rehabilitation Definitions” (80-VR-99.A).

V. POLICY

A. General

1. OOD shall provide information to individuals and if applicable, their parent or legal guardian, throughout the Vocational Rehabilitation (VR) process as required by law (e.g. rights and duties). This information shall be provided, in writing, and when appropriate, in the individual’s native language or through an appropriate mode of communication.

2. AWARE shall be updated with pertinent conversations, recommendations, justifications, approvals and/or other actions taken in relation to this policy.
 - a. If supervisory or management approval is required during the VR process, VR Staff or VR Contractor shall, via a "Custom Activity Due" in AWARE, request approval which shall include a written justification.
 - b. The supervisor or manager shall consider the VR Staff or VR Contractors' justification and document his/her approval or denial within the "Activity Due" as detailed below.
 - i. If approval is based on the written justification, the supervisor/manager shall enter "Approved" in the "Comments" and change the activity status to "Completed."
 - ii. If approval is based on the written justification but additional conditions/requirements need to be addressed before VR Staff or VR Contractor can take action on the approval; the supervisor/manager shall enter "Approved with Conditions" and document the conditions/requirements in the "Comments" and change the activity status to "Completed".
 - iii. If denied, the supervisor/- manager does not agree with the justification, he/she shall enter the words "Request Denied," and document the reason(s) for denial in the "Comments" and change the activity status to "Completed."
3. If any VR Staff or VR Contractors are a Certified Rehabilitation Counselor (CRC-certified) and will be directly involved with an individual's case, he/she shall complete the "Professional Disclosure Statement" (80-VR-01.E).
 - a. VR Staff or VR Contractors who are not a Certified Rehabilitation Counselor (CRC) are exempt from this requirement.
 - b. Once completed, the "Professional Disclosure Statement" shall be reviewed and signed by the individual and, if applicable, his/her parent or legal guardian, and the CRC-certified VR Staff or VR Contractor.
 - i. Once signed, the statement shall be scanned into the AWARE Participant Module, as a Case Note, with the category "Professional Disclosure Statement" and summary title "Signed."
4. The decision to close a case is a non-delegable function that can only be performed by Qualified Rehabilitation Personnel (QRP) and shall be completed in a timely manner.
5. Transition Services (80-VR-11-12) shall be followed for additional guidance and direction regarding case closure for students with a disability who are in a secondary educational institution.

B. Case Closure with Employment Outcome

1. A case shall be closed with an employment outcome once the requirements listed below have been met.
 - a. The employment outcome reached is as described in the individualized plan for employment (IPE) and is consistent with the individual's strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice.

- b. The employment has been verified.
- c. The employment meets the definition of competitive integrated employment.
 - i. Employment is performed on a full-time or part-time basis, in line with the employee's ability and stated preferences.
 - ii. As verified by VR Staff or VR Contractor during job placement, employment is compensated:
 - a) at or above minimum wage as verified by the employer (e.g. via paystub);
 - b) at the same rate that the employer pays other workers who do not have disabilities for the same or similar work; and
 - c) at the same rate that the employer pays other workers who are similarly situated in similar occupations by the same employer and have similar training and skills.
 - iii. The individual is eligible for the same level of benefits provided to other employees who do not have disabilities.
 - iv. Employment is in a setting typically found in the community.
 - v. Employment offers the same level of interaction with other employees or persons without disabilities to the same extent that employees without disabilities interact with these persons.
 - vi. Employment offers the same opportunities for advancement as employees without disabilities in the same or similar positions.
- d. Services provided on the IPE must have contributed to the achievement of the individual's employment outcome.
- e. The individual has maintained stable employment for no less than 90 days to ensure the stability of the employment outcome.
- f. There is agreement that:
 - i. employment is consistent with the employment outcome on the IPE and the placement plan; and
 - ii. the individual is performing the essential functions of the job independently (or with minimal supports).
- g. The individual is informed of the availability of post-employment services.

C. Case Closure without Employment Outcome

1. A case may be closed without an employment outcome due to a decision made by OOD (e.g. individual was no longer interested in services, individual unavailable to participate in services) or based on an OOD decision (e.g. an individual is considered ineligible for VR services).

2. When closing a case without an employment outcome, one of the following closure codes shall be selected to document the reason for closure (see “Case Closure Codes Listing” [80-VR-02.A]).
 - a. Closure codes pertaining to a Non-OOD Decision (unavailability):
 - i. institutionalized;
 - ii. incarceration;
 - iii. health/medical;
 - iv. death of the individual;
 - v. reserve forces called to active duty;
 - vi. transferred to another agency;
 - vii. disengaged;
 - viii. transportation not available;
 - ix. extended employment;
 - x. extended employment and sub-minimum wage
 - xi. extended services not available; or
 - xii. no longer interested in receiving services or future services.
 - b. Closure codes pertaining to a decision made by OOD during eligibility determination when the individual is in application status:.
 - i. ineligible - disability too severe/unable to benefit from services;
 - ii. ineligible - no disabling condition;
 - iii. ineligible - no impediment to employment;
 - iv. ineligible - does not require VR services;
 - c. Closure codes pertaining to a decision made by OOD to discontinue VR services post eligibility:
 - i. ineligible - post eligibility decision;
 - ii. unable to make progress.
3. Consultation Prior to Case Closure
 - a. Once there is a consideration to close a case without an employment outcome, an attempt to contact the individual to discuss the case shall be made.
 - b. At a minimum, an individual considered ineligible for VR services shall be provided the opportunity for a full consultation prior to case closure. The opportunity for full consultation if applicable, shall also extend to his/her parent, legal guardian.
 - c. The contact attempts and offer of consultation, if applicable, shall be documented in AWARE.

D. Case Closure Responsibilities

1. All required data (e.g. personal data, education level, and employment status) shall be collected and entered into AWARE.
2. Applicable providers shall be contacted to inform them that the case has been closed to prevent further services being provided and billed.

3. Necessary steps shall be performed, as detailed in the subsequently issued procedure, to close an individual's case.

E. Post-Closure Responsibilities

1. Once a case has been closed:
 - a. the appropriate written notification of case closure, which includes appeal rights, shall be sent to the individual; and
 - b. all outstanding invoices shall be processed for payment, all authorizations shall be cancelled after entry of a final payment(s) and all payments shall be released (refer to "Submission, Review, and Payment of Case Services Invoices" [40-FIN-02-02]).

F. Violation

An employee who violates this policy may be subject to discipline up to and including removal.

FORMS AND ATTACHMENTS

- 80-VR-02.A – Case Closure Codes Listing

RESOURCES

- 80-VR-99.A Vocational Rehabilitation Definitions
- 80-VR-11-12 Transition Services
- 80-VR-02-02 Extended Employment
- 80-VR-11-14 Job Related Services
- 40-FIN-02-02 Submission, Review and Payment of Case Services Invoices

FUNDING

Programs provided by the Opportunities for Ohioans with Disabilities are funded, in whole or in part, with federal grants awarded by the U.S. Department of Education (DOE) or the U.S. Department of Health and Human Services (HHS).

For purposes of the Vocational Rehabilitation (VR) Program, including Pre-Employment Transition Services (Pre-ETS), OOD received 78.7% of its funding through the DOE VR grant. In Federal fiscal year (FFY) 2018, OOD received \$100,336,097 in federal funds. Funds appropriated by the State covered 21.3 % of the total costs, or \$27,155,767. Of these federal funds, \$15,050,415 is set aside for Pre-ETS.

For purposes of the Supported Employment Program, the DOE VR grant funded 100% of the costs for the Supported Employment for Youth with a Disability Program. In FFY 2018, OOD received \$303,725. The grant also funded 95% of the Supported Employment Program (non-Youth). In FFY 2018, OOD received \$303,725 and the State appropriated funds paid the remaining 5% or \$33,747 of the total costs.

REVIEW

It is the responsibility of the Deputy Director, or designee, to review this policy, on or before, the date listed in the header and if applicable, make any necessary revisions. The Deputy Director, or designee, shall document the review as required in "Policy and Procedure Development, Review, Dissemination and Acknowledgement" (10-ADM-01).