




Title:	<b>Comprehensive Assessment</b>
Policy #:	<b>80-VR-04</b>
Legal Reference:	ORC 3304.15, OAC 3304-2-54; 34 CFR 361.42, 361.45, 361.46, 361.5, and 361.52
Date:	February 25, 2019
Approved:	Kevin L. Miller, Executive Director 
Origin:	Bureau of Vocational Rehabilitation and Bureau of Services for the Visually Impaired
Supersedes:	80-VR-04 (01/23/17)
History:	80-VR-04 (04/07/14), VRP-0340 (01/12/07 and prior versions), VRP-0810 "Homemaker Program Implementation" (6/22/07), and any other guidance issued for comprehensive assessment
Review/ Implementation	Begin Review – 08/03/20 Implement Revisions By – 02/01/21

**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 guidelines for a comprehensive assessment (CA) process in accordance with appropriate federal (e.g. Code of Federal Regulations [CFR]) and state law (i.e. Ohio Revised Code, Ohio Administrative Code), 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 procedure.
  - 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 OOD Staff 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 an AWARE Case Note, with the category “Professional Disclosure Statement” and summary title “Signed.”
4. The CA Process shall not begin if OOD is operating under an Order of Selection (OOS) and the individual is placed on the Statewide Waiting List.
5. Refer to “Transition Services” (80-VR-11-12) and “Pre-Employment Transition Services (Pre-ETS) Delivered by Contract Providers” (80-VR-20-02) for additional direction on the provision of transition services and the selection of an employment outcome for students with disabilities.
6. Refer to “Individualized Plan for Employment” (80-VR-08 and 80-VR-08-01) for specific guidance and direction on the implementation of the Individualized Plan for Employment (IPE).

7. Refer to “Fast Track for Vocational Rehabilitation Services” (80-VR-11-08) for specific direction when an individual has been determined to meet the requirements of that expedited process.
8. Refer to “Self-Employment” (80-VR-16 and 80-VR-16-01) for specific guidance and direction when an individual expresses an interest in pursuing self-employment.

**B. Purpose of the Comprehensive Assessment (CA) Process**

1. The purpose of the CA process is to determine the employment outcome and the nature and scope of VR Services to be included in the IPE.
2. The CA process shall begin after an individual is determined eligible and is completed to determine his/her;
  - a. unique strengths (e.g. works well in a team, proficient with computers);
  - b. resources (e.g. child care, transportation);
  - c. priorities (e.g. insurance, full-/part-time employment);
  - d. concerns (e.g. criminal background, homelessness);
  - e. abilities/capabilities (e.g. education, transferable skills);
  - f. interests (e.g. hobbies, leisure activities);
  - g. informed choice; and
  - h. VR needs (e.g. resources, tools), including the need for supported employment.
3. Information gathered during the CA process shall be utilized to:
  - a. develop and determine the employment outcome; and
  - b. determine the nature and scope of VR services to be included in the IPE to achieve the employment outcome.

**C. Review of Existing Information**

1. During the CA process, and to the extent possible, existing information (e.g. individual’s self-report, information provided by his/her family, information obtained during the eligibility and order of selection process), shall be reviewed to identify an individual’s unique strengths, resources, priorities, concerns, abilities, capabilities, interests, informed choice and needs, including the need for supported employment.

D. Obtaining Additional Information

1. When there is not enough existing information to identify an individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, informed choice, and needs; additional data shall be gathered through record requests or additional assessments.
  - a. If determined necessary, a background investigation, including a criminal record check, may also be required.
2. Additional assessments shall be completed in the most integrated setting possible.
  - a. If an assessment is to be completed in a non-integrated setting, justification shall be documented in an AWARE Case Note.

E. Counseling and Guidance

1. Counseling and guidance shall be provided during the CA process to give the individual information and to assist him/her in making informed choices about an employment outcome, VR services, and providers.

F. Selecting and Determining Viability of an Employment Outcome

1. When assisting an individual in selecting an employment outcome in a competitive integrated environment; it shall be ensure that the selection matches his/her unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and labor market information by considering the items below:
  - a. occupations in high demand;
  - b. local labor market data;
  - c. training, education, and/or skills needed to obtain a high demand occupation; and
  - d. work incentives counseling to determine eligibility for benefits and/or the impact of employment and earnings on benefits received by the individual, including those under Title II or XVI (SSI/SSDI) of the Social Security Act.
2. Justification for supporting or not supporting the selected employment outcome shall be documented in AWARE.

G. Need for Supported Employment

1. VR Staff or VR Contractor shall discuss with the individual and, if applicable, his/her parent or legal guardian, the need for supported employment services to assist the individual maintain employment.
2. The determination for supported employment shall be justified and documented in AWARE.

H. Service and Provider Selection

1. Once an employment outcome has been identified and agreed upon, additional vocational counseling and guidance shall be provided to assist the individual in utilizing their informed choice to identify appropriate VR services and providers.

I. Documentation of the CA Process

1. The CA process shall be documented in AWARE, as part of the official case record.

J. On-going process

1. The CA process shall continue throughout the case by monitoring the individual's progress and reassessing his/her VR needs.

K. Violation

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

## FORMS AND ATTACHMENTS

- N/A

## RESOURCES

- 80-VR-11-12 "Transition Services" (may be converted to 80-VR-20 and subsequent procedures)
- 80-VR-08 and 80-VR-08-01 "Individualized Plan for Employment"

## 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.

## 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).