




Title:	Comprehensive Assessment Procedure
Procedure #:	80-VR-04-01
Policy Reference:	80-VR-04 Comprehensive Assessment
Legal Reference:	OAC 3304-2-54; 34 CFR 361.45, 361.46, 361.42, 361.5 and 361.52
Effective 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 (04-07-14)
History:	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. PURPOSE

The purpose of this procedure is to provide direction 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 [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.

Refer to the AWARE Manual for more detailed instructions regarding the management of cases in AWARE.

II. APPLICABILITY

This procedure applies to VR Staff and VR Contractors

III. DEFINITIONS

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

IV. PROCEDURES

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 a 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 Delivered by Contract Providers" (80-VR-20-02) for additional direction on the provision of transition services and the selection of an employment outcome.
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.
9. Refer to “Business Relations - Job and Candidate Sourcing” (30-BR-01 and 30-BR-01-01) for guidance and direction on job ready individuals for whom the Job Now process may be appropriate.

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.
 - a. The CA process builds upon information obtained during eligibility determination and is limited to gathering additional information necessary in order to identify the individual’s VR needs and develop the IPE.
2. VR Staff or VR Contractor shall complete the CA process after an individual is determined eligible 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;
 - h. VR needs (e.g. resources, tools), including the need for supported employment; and
 - i. appropriateness for the Job Now process.
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 in order 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.

2. VR Staff or VR Contractor shall re-evaluate the individual's functional limitations identified during the OOS priority category determination to assess potential employment impacts.
 - a. To obtain and assess the impact of an individual's limitations, VR Staff or VR Contractor shall review existing information obtained during the application, intake, eligibility and OOS determination processes. This may include information:
 - i. which accurately accounts for the individual's functionality and capability for employment;
 - ii. available from other programs and providers, particularly information used by education officials, the Ohio Department of Mental Health and Addiction Services, the Ohio Department of Developmental Disabilities, and the Social Security Administration;
 - iii. provided by the individual and the individual's family (if applicable);
 - iv. gathered and/or observed by the VR Staff or VR Contractor through vocational guidance and counseling; and
 - v. regarding an individual's entitlement to benefits under Title II or XVI (SSI/SSDI) of the Social Security Act based on the significance of a disabling condition.

D. Obtaining Additional Information

1. After reviewing existing documentation, if additional information (e.g. records, assessments) is deemed necessary to complete the CA process; VR Staff or VR Contractor may:
 - a. request additional diagnostic information from a treating source (e.g. medical, psychological, educational, vocational records);
 - b. conduct interviews with the individual, family members, other authorized representatives and/or support persons (e.g. case managers, teachers) as needed; and
 - c. purchase medical, dental, or psychological evaluations in accordance with "VR Medical, Psychological and Dental (MPD) Services" (80-VR-10-01); and purchase assessment(s) (e.g. community-based assessment, vocational evaluation background check) in accordance with "Vocational Rehabilitation (VR) Assessment Services" (80-VR-11-01) for obtaining supplemental information.

E. Counseling and Guidance

1. VR Staff or VR Contractor shall discuss the information gathered during the CA process with the individual and, if applicable, his/her parent or legal guardian and provide vocational counseling and guidance regarding how, in the VR Staff or VR Contractor's professional judgment, the information gathered impacts the employability of the individual.
2. As part of vocational counseling and guidance, VR Staff or VR Contractor shall provide general information on additional support and assistance for individuals with disabilities desiring to enter the workforce, including assistance with benefits planning for individuals entitled to benefits under Title II or XVI (SSI/SSDI) of the Social Security Act on the basis of the significance of a disabling condition.

3. VR Staff or VR Contractor shall document counseling and guidance sessions, during the CA process, in an AWARE Case Note.

F. Selecting and Determining Viability of an Employment Outcome

1. When assisting an individual in selecting an employment outcome in a competitive integrated environment, utilizing informed choice; VR Staff or VR Contractor shall conduct career exploration-related activities directly with the individual, whenever possible, to provide information about:
 - a. Job Now opportunities , if appropriate;
 - b. occupations that are in high demand in the geographical area that the individual intends to seek employment;
 - c. preparation that would be needed for the individual to obtain various types of jobs, expected wages, career path potential, and employment projections; and
 - d. information needed to ensure that the individual is making an informed choice in his/her selection of an appropriate employment outcome.
2. To assist an individual in determining the viability of an employment outcome, VR Staff or VR Contractor shall consider whether:
 - a. the individual has reasonable potential to achieve the employment outcome given the information obtained through the CA process;
 - b. the employment outcome is in a competitive integrated environment; and
 - c. the outcome is supported by current labor market information (LMI); meaning there is sufficient availability of employment opportunities for the employment outcome in the geographical location that the individual intends to seek employment.
 - i. VR Staff or VR Contractor should use LMI data to augment observations and/or provider recommendations.
 - a) LMI data may be obtained from O*NET, Ohio Labor Market Information, OhioMeansJobs, The Career Index Plus (TCI+), or other reputable resources.
 - ii. In instances where LMI might not be available for a particular outcome or community, documentation should include resources such as local want ads, reference letters with a guarantee to hire.
3. Once an employment outcome is determined to be viable, VR Staff or VR Contractor shall proceed to Section I. for documentation requirements.
4. If the employment outcome is not determined to be viable VR Staff or VR Contractor shall provide additional counseling and guidance outlining alternative employment outcomes that OOD could support.

- a. If, after further vocational counseling and guidance has been provided, the individual wishes to proceed with an employment outcome not supported by OOD; VR Staff or VR Contractor shall proceed with case closure as outlined in “Vocational Rehabilitation Case Closure” (80-VR-02-01).
 - i. When closing a case, VR Staff or VR Contractor shall provide the individual and, if applicable his/her parent or legal guardian with information regarding their right to appeal the decision.

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. If it is determined that supported employment is appropriate, VR Staff or VR Contractor shall refer to “Supported Employment Services” (80-VR-11-03) for further direction.
 - a. VR Staff or VR Contractor shall consider whether on-going support services will be possible in the employment outcome setting.
 - b. VR Staff or VR Contractor shall also consider the sources that will provide those ongoing supports.

H. Service and Provider Selection

- 1. Once an employment outcome has been identified and agreed upon, VR Staff or VR Contractor shall provide additional vocational guidance and counseling to assist in the selection of VR services and providers.
- 2. VR Staff or VR Contractors shall only support VR services that are necessary to achieve the selected employment outcome and document in AWARE as indicated in Section I. below.
 - a. VR Staff or VR Contractor shall provide the “Selection of a Provider Information Sheet” (80-VR-07-01.A) as required in “Vocational Rehabilitation (VR) Informed Choice” (80-VR-07 and 80-VR-07-01).
 - b. VR Staff or VR Contractor shall assist the individual in utilizing OOD’s provider search tool to review provider information.

I. Documentation of the CA Process

- 1. VR Staff or VR Contractor shall document the CA Process in AWARE as outlined below.
 - a. CA Process Summary Case Note
 - i. VR Staff or VR Contractor shall document, in an AWARE Case Note with the category of “Comprehensive Assessment” and the summary “CA Process Summary”.

- ii. The AWARE Case Note shall include how each of the following elements factored into his/her decision to support the selected employment outcome and VR services chosen:
 - a) summary of impairments and functional limitations;
 - b) information review;
 - c) results from assessments (if applicable);
 - d) results of Job Now discussion, if appropriate; and
 - e) VR Staff or VR Contractor impressions.

b. IPE Page

- i. VR Staff or VR Contractor shall utilize the “Employment Goal Reason Narrative” text box, to document discussion with the individual and, if applicable, his/her parent or legal guardian, about the selected employment outcome (including an amended employment outcome), its viability, and the preferred employment setting.
 - a) Documentation shall, at a minimum, include the items listed below.
 - 1) The reason(s) the selected employment outcome and employment setting is most appropriate for the individual, considering his/her unique strengths, abilities, priorities, resources, concerns, and limitations.
 - 1.1 When working with students with a disability, VR Staff or VR Contractor are not required to document how each area is consistent for the employment outcome of “vocational exploration of (name of employment outcome)”.
 - 2) How the individual’s career interest(s) match the selected employment outcome and other outcomes that were explored.
 - 3) How informed choice was discussed.
 - 4) How local labor market information supports the viability of the employment outcome.
 - 4.1 When working with students with a disability, VR Staff or VR Contractor are not required to provide labor market information for the employment outcome of “vocational exploration of [name of employment outcome)”.
 - 5) The need for supported employment.
 - 5.1 If it is determined that supported employment is necessary and appropriate, VR Staff or VR Contractor shall check the “Supported Employment” checkbox and provide justification for the need.

- ii. VR Staff or VR Contractor shall document the information listed below on the “Planned Services” grid for each service (including services added via amendment).
 - a) Documentation for the service selection process, shall include, at a minimum:
 - 1) how the selected services will address the individual’s VR needs;
 - 2) the setting in which services will be provided (e.g. integrated); and
 - 3) the method(s) used to procure services.
 - b) Provider selection process.
- iii. In the text box, “How will this choice of employment goal lead to a job?” VR Staff or VR Contractor shall enter, “See Employment Goal Reason Narrative.”
- iv. In the text box, “What steps are needed to reach the employment goal?” VR Staff or VR Contractor shall enter, “See Planned Services.”
- v. The following IPE text boxes shall not be utilized/completed:
 - a) “How were these services arranged or chosen?”; and
 - b) “My responsibilities toward the cost of the plan and securing comparable benefits.”

J. On-going process

1. VR Staff or VR Contractor shall continue the CA process throughout the case by monitoring the individual’s progress and reassessing his/her VR needs.
 - a. At a minimum, VR Staff or VR Contractor shall maintain an ongoing relationship with the individual by contacting them via telephone or meeting in-person as required by “Individualized Plan for Employment” (80-VR-08-01) and document the contact in an AWARE Case Note.

K. Violation

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

FORMS AND ATTACHMENTS

- N/A

RESOURCES

- 30-BR-01 and 30-BR-01-01 Business Relations - Job and Candidate Sourcing
- 80-VR-11 and 80-VR-11-12 Transition Services
- 80-VR-11-13 Pre-employment Transition Services (Pre-ETS) Delivered by Contract Providers
- 80-VR-08 and 80-VR-08-01 Individualized Plan for Employment
- 80-VR-11-08 Fast Track for Vocational Rehabilitation Services
- 80-VR-16-01 Self-Employment

- 80-VR-06-02 Vocational Rehabilitation (VR) Statewide Order of Selection Wait List
- 80-VR-11-01 Assessment Services
- 80-VR-02 and 80-VR-02-01 Vocational Rehabilitation Case Closure
- 80-VR-11-03 Supported Employment Services
- 80-VR-07-01.A Selection of a Provider Informational Sheet
- 80-VR-07 and 80-VR-07-01 Vocational Rehabilitation (VR) Informed Choice

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 procedure, 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).