




Title:	Home Modifications
Procedure #:	80-VR-25-02
Policy Reference:	80-VR-25 Rehabilitation Technology
Legal Reference:	CFR 361.5, 361.48, 361.53, 361.60; OAC 3304-2-52, 3304-2-54, 3304-2-56, 3304-2-59, 3304-2-67
Effective Date:	April 30, 2018
Approved:	Kevin L. Miller, Executive Director 
Origin:	Bureau of Vocational Rehabilitation and Bureau of Services for the Visually Impaired
Supersedes:	VRP-0800
History:	N/A
Review/ Implementation	Begin Review – 10/30/19 Implement Revisions By – 04/30/20

I. PURPOSE

The purpose of this procedure is to provide direction for the provision of home modifications 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 instructions relating to this procedure.

II. APPLICABILITY

This procedure applies to VR Staff or 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. VR Staff or VR Contractor shall obtain supervisory approval if required, via use of an "Activity Due" in AWARE.
 - i. If supervisory or management approval is required during the VR process, the supervisor or manager shall document their approval in AWARE.
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. Home modifications shall only be provided if they are necessary to enable the individual to participate in vocational rehabilitation (VR) services provided under an Individualized Plan for Employment (IPE) that leads to his/her ability to obtain, advance in and/or retain a competitive integrated employment outcome.
5. If the property owner is someone other than the individual, he/she should be involved from the beginning of the process for consideration of home modifications.
6. In addition to this procedure, home modifications shall follow guidance in "Vocational Rehabilitation Purchases" (40-FIN-01-06). Contact Division of Fiscal Management (DFM), Finance Manager, or designee, for assistance.

B. Requirements for Home Modifications

1. VR Staff and VR Contractors shall only authorize home modifications when they are necessary, functional adaptations to existing structures to maximize an individual's independence as it relates to his/her ability to obtain, advance in and/or retain a competitive integrated employment outcome.
 - a. Home modifications are not considered home improvement projects, but rather to assist individuals in overcoming a disability-related barrier to employment.
2. VR Staff or VR Contractor shall only authorize home modifications to an individual's primary residence (i.e. the home from which the individual would normally leave to go to work or in the case where he/she works from home) in order to enable the individual to engage in VR services and/or obtain his/her employment goal. Modifications include, but may not be limited to:

- a. structural alterations to make features of the home more accessible (e.g. widening a doorway to access a bathroom); and
 - b. increase safety for use of space (e.g. roll-in shower, grab bars, mechanical lifts).
 - c. A room addition shall only be considered when a cost analysis indicates such construction is more cost effective than modifying existing structures.
3. Whenever possible, VR Staff or VR Contractor shall make every attempt to authorize non-permanent structural alterations that would be portable if the individual moves to a new residence.
- a. When non-permanent structural alterations are not available or do not meet the individual's functional needs, VR Staff or VR Contractor may authorize for structural modifications.
4. VR Staff or VR Contractor shall only authorize for home modifications when they are in compliance with local and state building codes.
5. VR Staff or VR Contractor should authorize for all approved disability related home modifications at the same time.
- a. In rare circumstances, additional home modifications may be authorized at a later time only if required due to a functional need to obtain, advance in or retain the employment goal listed on the IPE.
 - i. Area Manager approval must be obtained prior to authorization.
6. VR Staff or VR Contractor shall not authorize home modifications for the items and/or situations detailed below.
- a. Modifications that do not meet the functional needs of the individual.
 - b. Modifications to a newly constructed home which has been built specifically for the individual.
 - i. "Specifically built for the individual" means a residence that the individual entered into a contract to have built for them and which did not previously have any other occupants.
 - c. The purchase of land or newly built structures.
 - d. Modifications that involve movement or construction of exterior walls.
 - e. Modifications if there is a lien against the property.
 - i. VR Staff or VR Contractor may use county court records to access this information as liens on properties are public record.
 - f. Purchase or modifications of swimming pools, heated pools, Jacuzzis, whirlpool tubs, or saunas.

- g. Restoration of property to its original state after modifications have been completed.
- h. Installation of an elevator or a lift.

C. Comprehensive Assessment Process and Individualized Plan for Employment (IPE)

1. When assessing the functional need for home modifications, VR Staff or VR Contractor should consider the items listed below.
 - a. Will the requested home modification(s) enable the individual to participate in VR services necessary to achieve the employment goal listed on the IPE?
 - b. Who owns the property, the individual or another party?
 - i. VR Staff or VR Contractor shall obtain proof of ownership and document in the AWARE case record.
 - ii. Is the individual planning to move in the next two (2) years?
 - a) An individual considering a move to a new or different home may seek consultation on accessibility issues, but should not assume that OOD will modify an inaccessible house after the individual has moved in.
 - iii. Are the requested home modification(s) the least cost option(s) to remove barriers that would impede the eligible individual from participating in VR services and achieving a competitive integrated employment outcome?
 - a) Are there other alternatives that meet the functional needs of the individual (e.g. may rooms be re-arranged, may adaptive equipment or technology be used, if renting, the possibility of moving to an accessible place in lieu of a home modification).
 - iv. Has the home been previously modified?
 - a) Does the current modification(s) provide for one (1) entrance/exit, and/or an area to get ready for work?
 - v. How is the space currently utilized by the individual?
 - vi. What tasks will the room be used for after the proposed modification?
2. VR Staff or VR Contractor shall use a Rehabilitation Technologist to perform a home accessibility assessment.
 - a. To select a Rehabilitation Technologist, VR Staff or VR Contractor shall follow “VR Fee Schedules” (80-VR-10) and “Informed Choice” (80-VR-07-01).
 - i. Only rehabilitation technologists listed in the OOD Provider Management Program (PMP) and who have a current approved direct services contract with OOD shall be used when authorizing assessments for home modifications.

- b. Once selected, VR Staff or VR Contractor shall authorize the Rehabilitation Technologist to perform a home accessibility evaluation which shall include a report identifying the necessary modifications, if any. The report shall include the items listed below.
 - i. On-site inspection of the home and/or property to determine if it meets state and local building standards.
 - a) If residence and/or property requires upgrades to meet state or local building codes, it is the responsibility of the individual and/or the property owner to have the repairs made before OOD approves the home modification(s) and lists on the IPE.
 - b) VR Staff or VR Contractor shall not move forward with the home modifications process until the business, which completes the repairs, provides the individual and OOD written documentation that the home and/or property now meet the state and local building codes.
 - ii. If the modification includes adaptive equipment covered under the Ohio Department of Medicaid (ODM) fee schedule, VR Staff or VR Contractor should work with the Rehabilitation Technologist to make recommendations of suppliers who will take OOD authorizations and accept ODM maximum rates.
 - a) CPT Codes should be included in the recommendations, if known.
 - iii. Drawings/pictures of the house to explain the modification needed, if appropriate.
 - iv. Possible adaptive equipment or other accommodations that may be/were considered and might negate the need for structural changes to the home/dwelling.
 - v. The estimated costs for any recommended modifications.
 - vi. Estimated time frames for completion of the project.
 - c. If additional information is needed, VR Staff or VR Contractor shall follow up with the Rehabilitation Technologist who performed the evaluation.
3. Once the assessment has been completed, VR Staff or VR Contractor should discuss the items listed below with the individual and if applicable, his/her parent or legal guardian and the property owner, if other than the individual.
 - a. The findings from the Rehabilitation Technologist's report. If appropriate, include the Rehabilitation Technologist in the discussion.
 - b. The availability of resources to assist with the cost of providing modifications and if appropriate the potential comparable benefits if available.
 - i. VR Staff or VR Contractor shall follow guidance in the "Rehabilitation Technology" (80-VR-25) policy when considering comparable benefits.

- ii. Medicaid may be able to assist with the cost of the modification for individuals under 60, who are Ohio Medicaid recipients through the Ohio Home Care Waiver at <http://medicaid.ohio.gov/Portals/0/For%20Ohioans/Programs/HCBS/WaiverServices-Logo%20.pdf>
 - iii. For devices added to the modification that are considered durable medical equipment, VR Staff or VR Contractor may authorize up to the maximum rates established by the ODM Fee Schedule.
 - iv. Inquire of the homeowner, to see if he/she is able to contribute to the cost of the modifications.
 - v. Document potential comparable benefits in AWARE.
- c. That OOD shall only authorize for home modifications included in the original Rehabilitation Technologist report.
- i. If the individual and if applicable, his/her parent or legal guardian or the property owner, if other than the individual, inquire about upgrades, VR Staff or VR Contractor shall inform them it would be at their own expense (e.g. ceramic tile versus linoleum, specific finishes).
 - a) VR Staff or VR Contractor shall not authorize for any upgrades.
 - b) The supplier should make arrangements with the appropriate party for the payment of any upgrades prior to starting the work.
 - d. The potential timelines, maintenance, and repairs. Inquire as to any deed restrictions or home owner association rules so that the individual understands his/her responsibilities.
 - i. VR Staff or VR Contractor shall inform the individual and if applicable, his/her parent or legal guardian that he/she will be responsible for the maintenance, including repairs, to modifications made to the home.
4. VR Staff or VR Contractor shall determine which home modifications recommended are needed to remove barriers related to the individual achieving competitive integrated employment.
5. Prior to moving forward with the home modification, VR Staff or VR Contractor shall justify the functional need for the home modification and obtain supervisory approval in AWARE.
6. After supervisory approval has been obtained, VR Staff or VR Contractor shall request that the individual, and if applicable, his/her parent or legal guardian or the property owner, if other than the individual, read, sign, and date the "Acknowledgement of Understanding and Approval for a Home Modification" (80-VR-25-02.A) form and scan the document into AWARE;
7. Requesting Bids
- a. VR Staff or VR Contractor shall refer to "VR Purchases" (40-FIN-01-06) prior to issuing bids for home modifications.

- i. VR Staff or VR Contractor shall work with the Division of Fiscal Management, Finance to determine the best way to request bids on any item or project in the following situations:
 - a) items or services are not listed on the VR Fee Schedule or if a supplier will not accept maximum rates established on the ODM fee schedules; and
 - b) the item or project is projected to exceed \$5,000.
- ii. A minimum of three (3) bids must be solicited.
 - a) The Rehabilitation Technologist who performed the assessment of the project, or any entity in which he/she holds an interest in, is prohibited from bidding on the project.
 - 1) The Rehabilitation Technologist may, however, suggest names of suppliers with whom OOD has authorized in the past.
- b. The Rehabilitation Technologist's report shall be sent to potential suppliers in order to request bids.
 - i. Attached to the report shall be a "Supplier Requirements for Submission of Home Modification Bid" (80-VR-25-02.B). This form must be returned with a supplier's bid and includes the requirement to submit proof of license and insurance/bonding as well as items which the supplier must agree to.

8. Selecting a Supplier to Perform Home Modifications

- a. VR Staff or VR Contractor shall choose the least cost supplier, as directed in "Vocational Rehabilitation Purchases" (40-FIN-01-06), who meets the disability-related needs of the individual. Note: The bidder must have returned a signed/dated "Supplier Requirements for Submission of Home Modification(s) Bid" form or their bid is not acceptable.
 - i. If a supplier requests an agreement, contract or any other type of binding document to be signed by, VR Staff or VR Contractor shall forward to the Division of Legal Services (refer to "Legal Agreements" [70-CM-01] for review).
 - a) Under no circumstances should VR Staff or VR Contractor sign any of these types of documents.
 - ii. An OOD legal agreement may be required (e.g. labor is included in the purchase) prior to issuing an authorization. Contact the DFM, Finance to determine whether an agreement will be required.
- b. If additional disability-related changes are needed after a recommendation has been provided or implemented, VR Staff or VR Contractor shall follow the guidance in Section D. of this procedure.

9. Completion of the IPE

- a. VR Staff or VR Contractor shall follow direction in "Individualized Plan for Employment" (80-VR-08 and 80-VR-08-01) when including home modification(s) on an IPE.

- i. Only home modifications determined necessary for an individual to participate in VR services and/or the employment goal listed on the IPE shall be included.

D. Completion of Home Modifications

1. Once the supplier is awarded the bid and prior to beginning the home modifications, the supplier must:
 - a. conduct the necessary inspections to determine whether the existing home is in compliance with applicable codes;
 - b. develop a construction schedule with the individual and the property owner, if other than the individual;
 - c. supply a copy of the construction schedule to the VR Staff or VR Contractor, the individual and the property owner, if other than the individual;
 - d. obtain any required permits needed for the modifications;
 - e. initiate project within 30 days from receipt of the authorization; and
 - f. complete the project within 60 days, unless special arrangements are made with OOD.
2. Upon completion of modification(s) and prior to releasing the payment for the work, an inspection shall be conducted by VR Staff or VR Contractor, the Rehabilitation Technologist, and any appropriate local authorities to assure the work is completed as authorized.
3. The supplier shall provide a one (1) year warranty from the date of final completion of work against defective workmanship, and shall guarantee that all materials/products/ appliances installed or furnished perform their advertised functions as required in the original bid documents.
 - a. Additional warranties may be provided by the relevant manufacturers and the individual and the property owner, if other than the individual, shall be given copies of all warranties.
 - b. Copies of the supplier's warranty and any manufacturers' warranties shall also be placed in the AWARE case record.
4. VR Staff or VR Contractor shall have the supplier that has completed/overseen the work complete the "Supplier Affidavit of Completion of Home Modification" (80-VR-25-02.B).
 - a. Once the form has been signed and dated by all required parties, OOD shall have no further responsibility for the maintenance, repair, replacement, or removal or any part of the home modification.

E. Violation

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

FORMS AND ATTACHMENTS

- 80-VR-25-02.A Acknowledgement of Understanding and Approval for a Home Modification
- 80-VR-25-02.B Supplier Requirements for Submission of Home Modification(s) Bid
- 80-VR-25-02.C Supplier Affidavit of Completion

RESOURCES

- 80-VR-99.A Vocational Rehabilitation
- 80-VR-07-01 Informed Choice
- 80 VR-10-02 VR Medical, Psychological and Dental (MPD) Services ()
- 40-FIN-01-06 Vocational Rehabilitation Purchases
- 80-VR-08 and 80-VR-08-01 Individualized Plan for Employment 80-VR-25 Rehabilitation Technology

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).