




Title:	Interpreter, Reader and Personal Assistance Services (PAS)
Procedure #:	80-VR-11-16
Policy Reference	80-VR-11
Legal Reference:	34 CFR 361.5, 361.32, 361.42, 361.46, 361.48, 361.53, 361.54; OAC 3304-2-52, 3304-2-56, 3304-2-59
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Approved:	Kevin L. Miller, Executive Director 
Origin:	Bureau of Vocational Rehabilitation and Bureau of Services for the Visually Impaired
Supersedes:	N/A
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 individuals in need of interpreter, reader and personal assistance services (PAS) 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 all VR Staff and VR Contractors.

III. DEFINITIONS

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

IV. PROCEDURES

A. General

1. Opportunities for Ohioans with Disabilities (OOD) shall provide information to individuals and if applicable, their parent(s) or legal guardian(s) 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. If supervisory or management approval is required during the VR process, the supervisor or manager shall document their approval in AWARE. If written approval is received from a supervisor or manager it shall be added to AWARE.
3. If any OOD Staff are a Certified Rehabilitation Counselors (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. VR Staff or VR Contractor shall follow "Vision Rehabilitation Therapy and Orientation and Mobility" (80-VR-11-09) for additional direction regarding the provision of vision rehabilitation therapy and orientation and mobility (O&M) services.

B. Providing Sign Language Interpreter Service Prior to an Application for Services

1. VR Staff or VR Contractor shall use the process outlined in this section to provide sign language interpreter services prior to an individual becoming an applicant when it is determined necessary to participate in the intake process.
 - a. Reader and PAS services should not be authorized for an individual who has not completed an application for services and/or have not been entered into the participant module.
2. VR Staff or VR Contractor shall utilize interpreters approved by OOD's Division of Human Resources (HR), unless available through comparable benefits or services, to provide sign language interpreter services prior to the completion of an application when necessary to participate in an intake appointment.
 - a. Once a case is open in Participant Module, VR Staff and VR Contractor shall authorize for services for individuals as outlined in the Section E. "Identifying Providers and Suppliers Requiring a Service Authorization."
3. Scheduling an interpreter for an Intake Appointment.
 - a. When scheduling an intake appointment, VR Staff or VR Contractor should select up to three (3) possible dates for the appointment.
 - i. The intake dates should allow a lead-time of at least 14 calendar days.

- b. To request an interpreter for the intake appointment, VR Staff or VR Contractor shall complete the “Request for Interpreter or Captioning” (50-EEO-02-01.D) form. The verbiage provided below shall be used for completing various fields on the form.
 - i. “Event Date”
 - a) Enter up to three (3) dates of availability for the intake appointment.
 - ii. “OOD Contact”
 - a) Enter the name of the VR Staff or VR Contractor conducting the intake.
 - iii. “Event for”
 - a) Check the boxes “VR” and “Other.”
 - 1) Enter “Pre-Applicant” in the field by “Other”.
 - iv. “Type Of Service Being Requested”
 - b) Check the box “Interpreter”.
 - v. “Name(s) of Individual(s) Receiving Service”
 - a) Enter the name of the VR Staff or VR Contractor conducting the intake.
- 4. The completed form shall be emailed to OOD’s HR’s Office of Diversity and Inclusion (ODI) at OOD.DiversityandInclusion@ood.ohio.gov
 - a. “Pre-Applicant Interpreter Request” should be entered in the subject line.
- 5. HR’s ODI shall secure the interpreter and coordinate the service with the VR Staff or VR Contractor making the request.
 - a. A minimum of 14 calendar days’ notice should be provided.
 - b. OOD HR ODI shall send an Outlook Calendar Invite to the appropriate VR Staff or VR Contractor which will include the name of the interpreter and their contact information as confirmation that the interpreter has been scheduled.
- 6. VR Staff or VR Contractor shall contact the individual to confirm the intake appointment date and time once confirmation is received from HR ODI.
- 7. VR Staff or VR Contractor shall complete the requirements below, if an individual cancels his/her intake appointment.
 - a. Immediately contact the interpreter directly via telephone to cancel the services; and
 - i. A minimum 24-hour notice is required to avoid cancellation charges.
 - b. Decline the Outlook Calendar invite using the editing feature to notify HR ODI.

- i. Include the following cancellation details:
 - a) the individual initiating the cancellation (e.g. VRC, interpreter); and
 - b) the reason for the cancellation (e.g. illness).
 - ii. If the interpreter's contact information has not been received via an Outlook Calendar invite, VR Staff or VR Contractor shall call 614-438-1421 or send an email to OOD.DiversityandInclusion@ood.ohio.gov with cancellation details.
 - c. VR Staff or VR Contractor shall refer to above to B.1-6. to reschedule an interpreter for an intake appointment.
8. Documentation of Interpreter Services for Intake Appointment
- a. VR Staff or VR Contractor shall ensure that OOD's "Reasonable Accommodation Contractual Services Sign In/Sign Out Log" (50-EEO-02-01.A) is completed and submitted within three (3) business days of the intake appointment.
 - b. VR Staff or VR Contractor shall complete the log in its entirety, including using the verbiage provided below in the various fields on the form.
 - i. "Meeting for"
 - a) Check the boxes "VR" and "Other"
 - 1) Enter "Pre-Applicant" in the "Please Specify" field.
 - ii. "Type of Service Being Provided"
 - a) Check the "Interpreter" box.
 - iii. "Name(s) of OOD Employee(s) Receiving Service"
 - a) Enter the name of the VR Staff or VR Contractor conducting intake.
 - iv. "Hours Claimed"
 - a) Indicate payable service hours, not counting time spent for lunch, travel or breaks.
 - v. "Reimbursable Mileage"
 - a) Enter '0' as mileage is not reimbursable for any interpreter services.
 - vi. Signature Area
 - a) VR Staff or VR Contractor shall ensure that the Interpreter (i.e. "Provider's Signature) signs and dates the form first.

- b) VR Staff or VR Contractor shall approve the information on the form by affixing his/her signature (i.e. "OOD Staff Signature") and date after the Interpreter has signed.
 - c) VR Staff or VR Contractor should disregard the requirement for a Supervisor signature as this is not required.
- c. VR Staff or VR Contractor shall email the completed OOD's "Reasonable Accommodation Contractual Services Sign In/Sign Out Log" (50-EEO-02-01.A) to OOD.DiversityandInclusion@ood.ohio.gov for processing.
- i. Indicate "Pre-Applicant Interpreter Service Log" in the subject line.
9. Approval of payment of interpreter services provided for intake appointments.
- a. HR ODI or ODI designee shall approve payment of service.
 - i. If there are any discrepancies between information submitted by the interpreter and provided by VR Staff or VR Contractor, the HR ODI, or ODI designee, may contact necessary individuals to resolve the issues.

C. Provision of Services for Interpreters, Readers, and Personal Assistance Post-Application

1. Interpreter, reader, and PAS may be provided by OOD as time-limited service(s) only when they are necessitated by an individual's participation in VR services and are in excess of normal daily needs for these services.
 - a. Services that are supported by OOD cannot replace services or natural supports that are already being used by the individual and must exceed the scope of the services that are already in place due only to an individual's participation in VR services.
 - i. VR Staff or VR Contractor may not supplant the provision of services when another public entity is responsible under law.
 - a) Follow the direction of "Transition Services" (80-VR-11-12) regarding the supplanting of services for a student with a disability.
 - b. Services may be provided if necessary, to support the individual's participation in assessment services, including trial work experiences, for the purposes of determining eligibility.
 - i. VR Staff or VR Contractor shall follow direction of "Vocational Rehabilitation Assessment Services" (80-VR-11-01) for the provision of assessment services.
2. VR Staff or VR Contractor shall work with an individual when he/she is receiving VR services to ensure that interpreting, reading, and PAS are available and/or provided to the extent that they are needed to ensure that the individual has equal access to VR services. VR Staff or VR Contractor may use the methods listed below to make this determination.

- a. Discussion of functional limitations, including the following if applicable:
 - i. specific personal care needs and the availability of resources to provide these services; and
 - ii. the individual's ability to learn to manage his/her own personal care needs.
 - b. Observation of difficulty in completing tasks (e.g. ability to complete paperwork independently).
 - c. Review of documentation obtained during the eligibility and comprehensive assessment process, including but not limited to, medical, psychological and/or educational records (e.g. IEP, ETR, psychological report).
 - d. Performance of an evaluation to assist in determining the extent of services needed and/or if rehabilitation technology, including assistive technology, may meet all or a portion of an individual's needs.
3. When needs can be addressed through training or the provision of rehabilitation technology, including the use of assistive technology, VR Staff or VR Contractor shall utilize the VR Fee Schedule, located in the VR Provider Manual and consider:
- a. using the Activities of Daily Living (ADL) skills training and/ or the Orientation and Mobility (O&M) services when ADL needs can be addressed through training to teach the individual to conduct ADLs independently; and/or
 - i. VR Staff or VR Contractor shall use the direction of "Vision Rehabilitation Therapy and Orientation Mobility" (80-VR-11-09) to determine the need for O&M training.
 - b. using the Rehabilitation Technology services and Low Vision services when needs can be addressed through the use rehabilitation technology and/or assistive devices.
4. VR Staff or VR Contractor should provide counseling and guidance to the individual, beginning at intake and throughout the VR process regarding a plan for the continuation of services to a long-term supplier once employed.
- a. VR Staff or VR Contractor should consider the impact on individuals' participation in services and/or employment as these services are being transitioned to the responsibility of the individual. -
 - i. When providing PAS services, VR Staff or VR Contractor should consider transitioning to a long-term supplier prior to employment, when possible or appropriate.
 - b. VR Staff or VR Contractor shall refer to Section G. "Case Closure" for additional information.

D. Identifying No Cost Providers and Suppliers

1. VR Staff or VR Contracts shall follow the direction of “Vocational Rehabilitation (VR) Informed Choice” (80-VR-07-01) when identifying the provider and/or supplier to provide services.
2. VR Staff or VR Contractors should encourage an individual to utilize his/her natural supports (e.g. family, friends) to provide support services at no cost to OOD, if available or appropriate.
3. When natural supports are not available or appropriate, VR Staff or VR Contractor meeting with an individual may act as a reader (writer) or interpreter as deemed appropriate.
 - a. VR Staff or VR Contractor shall not provide PAS.
 - b. Whenever possible, VR Staff or VR Contractors managing a case who are bilingual shall be utilized to serve the individual so that interpreter services do not need to be authorized.
 - i. When additional parties, who are not bilingual, are a part of the meeting, consideration should be given as to whether or not the bilingual staff could serve as an interpreter.
 - c. Whenever possible, VR Staff or VR Contractor may support the individuals by serving as a reader (writer). For example, VR Staff could read materials provided during the intake interview.
4. When VR Staff or VR Contractor are unable to directly provide a service, comparable benefits and/or free community services shall be identified and used unless such a determination would interrupt or delay the progress of the individual toward achieving the employment outcome identified on the IPE or an immediate job placement.
 - a. When an individual is a recipient of Social Security benefits (e.g. SSI, SSDI), VR Staff or VR Contractor should refer the individual to Work Incentives Planning Services to determine the availability of additional comparable benefits.
 - i. VR Staff or VR Contractor shall follow the direction in “Work Incentives Planning Services” (80-VR-11-15) for additional information.
 - b. VR Staff or VR Contractor should encourage the individual to apply for Medicaid, including Medicaid Buy-In, when appropriate.
5. When services are unable to be provided through the means identified above, VR Staff or VR Contractor shall authorize for interpreter, reader, or PAS services as outlined in Section E. “Identifying Providers and Suppliers Requiring a Service Authorization.”

E. Identifying Providers and Suppliers Requiring a Service Authorization

1. VR Staff or VR Contracts shall continue to follow the direction of “Vocational Rehabilitation (VR) Informed Choice” (80-VR-07-01) when identifying a provider and/or supplier requiring a service authorization.

2. Interpreters

- a. VR Staff or VR Contractor may only authorize to an interpreter service approved in OOD's PMP.
- b. VR Staff or VR Contractors shall utilize the VR Fee Schedule, located in the VR Provider Manual to identify rates when authorizing for Interpreter.
 - i. When a sign language interpreter is needed for an individual who has not completed an application and is in the AWRE Referral Module, VR Staff or VR Contractors shall refer to Section B. "Providing Sign Language Interpreter Service Prior to Application for Services."

3. Readers

- a. VR Staff or VR Contractor may only authorize to a Community Rehabilitation Provider (CRP) approved in OOD's PMP to provide reader services.
 - i. Reader services must be listed on the provider's addendum in the PMP.
 - ii. VR Staff or VR Contractor shall authorize to a CRP for reader services at the rate listed in the addendum approved in PMP.
- b. When reader services are not available from an approved CRP in the PMP, VR Staff or VR Contractors shall work with the individual to identify a supplier to provide the reader services and negotiate rates for reader services with the supplier after considering the items below.
 - i. Current Hourly Minimum Wage in Ohio.
 - a) VR Staff or VR Contractor shall not negotiate a rate lower than the State of Ohio's minimum wage.
 - ii. The customary rate charged/covered by the post-secondary institution, when the individual is attending a post-secondary institution.

4. Personal Assistance Services (PAS)

- a. VR Staff or VR Contractor shall follow processes outlined in the "VR Medical, Psychological and Dental (MPD) Services" (80-VR-10-02) including, but not limited to the items listed below.
 - i. Selecting a supplier from the MPD Supplier list who will accept OOD authorizations and agree to Ohio Department Medicaid (ODM) max rates.
 - ii. Verifying the Current Procedural Terminology (CPT) code, also known as the Healthcare Common Procedure Coding System (HCPCS) code and ODM max rate assigned to each individual service.

- a) VR Staff or VR Contractor shall use the ODM Fee Schedule to identify “Home Health Rates” when authorizing PAS which can be found at the following link:
<http://medicaid.ohio.gov/PROVIDERS/FeeScheduleandRates/SchedulesandRates.aspx>
- iii. Provide the necessary authorization information in the “Special Instructions Printed on the Authorization” section.
- b. VR Staff or VR Contractor may only authorize PAS to the types of supplier(s) listed below.
 - i. Individual operating within the scope of his/her state licensure (e.g. physical therapist).
 - ii. A Medicaid approved home health agency.
 - iii. An individual who is not affiliated with an agency possessing an approved Medicaid Provider agreement that permits the provision of home care attendant services.
 - iv. A Community Rehabilitation Provider (CRP) approved in OOD’s PMP, when they meet all of the following criteria:
 - a) has PAS listed on the provider’s addendum in PMP;
 - b) the CRP and/or staff member(s) providing PAS meets one of the criteria described above in E.4.b.i-iii; and
 - c) the CRP accepts the ODM rate as full payment for the service.
 - v. An individual’s natural supports (e.g. family, friends) can be approved as a supplier when the individual meets the necessary criteria to provide services on the Medicaid fee schedule, will accept OOD authorizations and is willing to accept ODM max rates as outlined in E.4.b.i. through iii.
- c. Locating a Medicaid Approved Supplier for PAS
 - i. When determining if an agency or individual is approved to provide services, VR Staff or VR Contractor may:
 - a) access the Ohio Department of Health’s website for a list of possible home health agencies via the following link:
http://publicapps.odh.ohio.gov/EID/Provider_Search.aspx and then select “Home Health Agency” under Provider Type;
 - b) access the Ohio Department of Medicaid’s website for a list of possible approved provider via the following link:
<https://portal.ohmits.com/Public/Public%20Information/search%20provider%20directory/tabId/61/Default.aspx> ; and
 - c) request a copy of the supplier’s approved Medicaid Provider agreement.
 - 1) A copy of the Provider agreement shall be scanned in AWARE as a case note.

F. Documentation

1. VR Staff or VR Contractor shall follow the direction of “Vocational Rehabilitation (VR) Informed Choice” (80-VR-07-01) and document the provision of informed choice during the determination of VR services, procurement of services and the selection of the provider and/or supplier.
2. VR Staff or VR Contractor shall document a justification in AWARE when services are available, but not utilized or appropriate, through natural supports, directly by VR Staff or VR Contractor, comparable benefits and/or free community resources.
3. VR Staff or VR Contractor shall document the need for and the provision of the service(s) in an AWARE case note when the service is needed prior to the implementation of the IPE.
 - a. VR Staff or VR Contract shall refer to Section B. “Providing Sign Language Interpreter Service Prior to Application for Services” for information on required forms and include a copy of all forms in AWARE.
4. VR Staff or VR Contractor shall document the need, provision, and the plan for continuation of services in the Comprehensive Assessment and the Individualized Plan for Employment (IPE) in AWARE.
 - a. For additional direction on documentation of services and providers on an IPE, VR Staff or VR Contractor shall follow direction in “Individualized Plan for Employment” (80-VR-08-01).

G. Case Closure

1. Prior to case closure, VR Staff or VR Contractor should follow the direction of “Job Related Services” (80-VR-11-14) for additional guidance regarding the provision of services available from the employer as a reasonable accommodation in addition to the following.
 - a. VR Staff or VR Contractor should refer to Section D. “Identifying No Cost Providers and Suppliers” and continue to review and support the individual in obtaining access to available resources, when appropriate and/or necessary.
 - b. Reader and Interpreter Services
 - i. Since OOD services are time-limited, VR Staff or VR Contractor should review with the individual the availability of supports that the employer could provide that should meet the needs of the individual.
 - c. Personal Assistance Services
 - i. Since PAS is typically not a support provided by an employer, VR Staff or VR Contractor should review the availability of long-term suppliers for the provision of PAS.
 - a) VR Staff or VR Contractor may refer the individual, as appropriate, to the Personal Care Assistance Program by following the direction of “Personal Care Assistance Program” (85-PCA-01) and subsequent procedures.

- b) Additional resources for PAS can be found on the Independent Living Research Utilization Website (www.ILRU.org) under the “Resources” tab.

H. Violation

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

FORMS AND ATTACHMENTS

- N/A

RESOURCES

- 80-VR-99.A Vocational Rehabilitation Definitions
- 80-VR-25Rehabilitation Technology”
- 80-VR-01.E Professional Disclosure Statement
- 50-EEO-02-01.A OOD Reasonable Accommodation Contractual Services Sign In/Sign Out Log
- 50-EEO-02-01.D Request for Interpreter or Captioning
- 80-VR-08-01Individualized Plan for Employment
- 80-VR-10 – Appendix A VR Fee Schedule
- 80-VR-10-01 VR Medical, Psychological and Dental Services
- 80-VR-11-09Rehabilitation Teaching and Orientation and Mobility
- 40-FIN-01 Purchasing
- 40-FIN-01-06Vocational Rehabilitation Purchases

REVIEW

It is the responsibility of the Deputy Director, or designee, to annually 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 annual review as required in OOD Policy 10-ADM-01 Policy and Procedure Development, Review, Dissemination and Acknowledgement”.