

## COVID-19 Response - Interim Guidance for Vocational Rehabilitation Service Providers – FAQ

Updated FAQ on 6/8/2020

### **Is OOD allowing for staff to participate in remote CARF surveys?**

Yes, OOD is allowing for staff to participate in remote CARF surveys, as they are not currently doing on-site surveys. Providers should begin with their OOD Supervisor liaison to identify staff who can participate in these surveys.

### **How should providers document participant agreement for reporting such as Intakes and the Job Start form for remote services? Can a provider note “signature waived” on reporting?**

OOD is allowing for alternate documentation of participant agreement on reports for remote services. However, the note “signature waived” does not fulfill the requirement to document consent. Instead, ask participants to email their agreement, document their verbal consent in reports, or check to see if they can sign electronically and send them through email. When a participant's signature cannot be physically obtained, be sure to document on the form how the acknowledgment occurred, e.g., “Jane Doe provided approval via email on 3/23/2020,” or “verbal consent was obtained by Jane Doe by phone on 3/23/2020.” Include any documentation (email) you may have to help document this.

### **Which services are approved to be provided remotely?**

Most VR services are approved to be provided remotely at this time, including Intakes, Job Development, On-The-Job Supports, Work Incentive Planning, Career Exploration, Vocational Evaluations, Interpreter Services, Pre-Employment Transition Services, and Job Seeking Skills Training. Community-Based Assessments, Work Adjustments and Job Readiness Training cannot be provided remotely. These services are required to be conducted in person at an employer's worksite as part of the service definition and cannot be performed remotely.

Activities of Daily Living (ADL) services may be provided remotely for services that do not require on-site assistance such as budgeting. ADL services that are traditionally provided in person, such as cooking or ironing, cannot be provided remotely.

All remote services must be direct services to participants through phone, Skype, Facetime, or other electronic communication. Texting (excluding disability-related accommodations) is not an approved delivery method for remote services. At this time, remote services do not include any “assigned” tasks for the participant to be completed as homework, such as completing online training independently. To be counted as service time, activities must involve a staff person in direct communication with the participant.

Services outside of those mentioned here, such as Addendum/Misc. can be considered to be provided remotely. Providers are required to email the Provider & Contract Management Unit at [crpvendor@OOD.Ohio.gov](mailto:crpvendor@OOD.Ohio.gov) with their proposal and to receive approval.

## **Will OOD allow for Orientation & Mobility Services to be provided remotely?**

OOD also recently expanded the use of remote services to include Orientation & Mobility. Providers are able to complete as much of the assessments as possible virtually so that they can start making plans for training. OOD has also decided to allow a limited scope of instruction to include items such as concept development or instruction through family members (sighted guide techniques, etc.) as the specialist finds appropriate.

## **How should a provider document that services were provided remotely?**

As remote services continue to be utilized, it is important for a provider to document how services are delivered in reports. Provider will obtain and document the participant's agreement to participate in services remotely, the technology utilized and location of the participant receiving the service (e.g., the participant agreed to remote services and joined via Skype from their home).

**Are we able to provide services in the home? Which services are allowable? Will this include ILOB services?** As OOD allows for remote services at this time, we are not allowing for services to be conducted in participants' homes (including porch, stairwell, etc.), property, or in a car (with the exception of transportation). Due to the COVID-19 pandemic, OOD has allowed for many services to be delivered remotely so that they can continue in a manner that complies with Ohio's public health orders.

The only services OOD allows to be conducted with provider staff in homes include ADLs (for skills which require in-person delivery, such as cooking or ironing), Orientation & Mobility, and for a limited scope of Rehabilitation Technology services. Rehabilitation Technology services may be provided in a participant's residence for a home modification/physical accessibility modification. Rehabilitation Technology services such as computer training and assistive technology services are only to be provided in-home when the participant works from home, or the service will promote employability and independence. If the service may be provided in a provider facility or the community/place of employment, this shall take precedence.

As you begin to provide in-home and in-person services to individuals, which OOD now includes for participants who are Independent Living Older Blind (ILOB), here are some guidelines to consider:

1. Follow all state and local health department guidelines, as well as your own internal/agency health and safety guidelines and protocols.

2. The counselor will start the conversation with the participant to determine their comfort level and obtain any approval for in-home services. Honor the individual's choice of how and where to receive services.
3. Consider minimizing the number of trips, if you can schedule a longer day for the individual that is preferred over going out for several sessions.
4. Consider reducing the number of individuals who go out to the participant's home. If one service provider can provide multiple services, this is preferred.
5. Remote/virtual services are still preferred to protect both our program participants and provider staff.
6. No in-person services are to occur in nursing homes at this time. For individuals living in an assisted living facility, staff and providers should consult with the assisted living facility on their protocol and follow those guidelines.

If there are any questions about if a service can be provided in-home, please consult PCMU at [crpvendor@OOD.Ohio.gov](mailto:crpvendor@OOD.Ohio.gov).

### **Are documentation requirements for remote services waived?**

All documentation required to be submitted with billing according to the VR Provider Manual and Fee Schedule remain the same. If a service has a required document, they are required to be submitted, even if the service is provided remotely (e.g., Pre-ETS Job Exploration Counseling requires copies of student's assessment of student's knowledge of where they are in the career planning process, copies of informational interviews, the date of registration with OhioMeansJobs.com and creation of the student's Backpack). Please review your documents as well as the VR Provider Manual to ensure all required documentation for services are sent together when submitting billing to OOD so billing can be processed in a timely manner.

### **Would OOD consider temporary placements for Tier II at this time? When would a "temporary" position be considered permanent?**

OOD cannot consider temporary positions for Tier II placements based on our reporting requirements and Fee Schedule definitions. However, some positions which begin as temporary positions later become permanent placements. For example, some holiday/seasonal placements become permanent after the larger need is met (e.g., in January, an employer may keep some seasonal hires on for a permanent basis, though many of these positions are temporary). If the temporary position the individual obtains becomes an appropriate permanent position, work directly with the counselor. If the counselor/coordinator and participant are in agreement that this meets their IPE employment goal and is an ongoing permanent position, Tier II can be authorized. Tier III should begin once a placement is stabilized (e.g., On-the-Job Supports have faded, etc.).

## **Would OOD authorize for additional Job Development via Units of Service for a participant currently engaged in Performance-Based Job Development?**

A participant engaged in Performance-Based Job Development would not receive additional Units of Service (UOS) for job development, as those services are part of Performance-Based Job Development (e.g., Tiers I, II, and III). OOD is allowing for additional JSST (up to 100 UOS per month) for additional job preparation. In some circumstances in which the participant's employment goal cannot be pursued at this time, counselors may authorize for Non-permanent Job Development to pursue temporary employment on a case by case basis.

## **Are provider staff required to hold a CESP to provide Supported Employment Job Development given some delays in CESP testing?**

CESP certification requirement for Supported Employment Job Development Tier I and II remain in place as part of the Fee Schedule requirements and reason for the enhanced service rates. Staff providing the direct service must be the person who holds the CESP certification. APSE has scheduled multiple CESP testing windows, including the following:

Testing Windows	Application Windows
June 1 - 30, 2020.	Open through May 26, 2020.
August 3 - 14, 2020	June 29 - July 27, 2020
October 5 - 15, 2020	September 1 - 28, 2020

OOD has offered testing support for 274 direct service staff so far in FFY20. OOD will continue to communicate testing support assistance to providers through Granicus. Please visit [APSE.org](http://APSE.org) for more details about testing dates and to sign up.

**Please refer to the Summer Youth Foundations FAQ for further guidance on summer youth services. This can be found on the OOD.Ohio.gov website. Click on "Information for Providers." You will find the FAQ under "Provider Manuals."**

### ***Original FAQ Posted on 3/27/2020:***

**OOD has waived the participant signature requirement for Intakes and Job Development plans. Could OOD also waive the requirement for the participant signature on the "Job Start" form? How should the participant approval/acknowledgment be documented?**

Yes, OOD's Director has now approved the waiving of participant signatures on the "Job Start" form. When participant signatures cannot physically be obtained in these circumstances,

document on the form how the acknowledgment occurred e.g. “Jane Doe provided approval via email on 3/23/2020.” An email acknowledgment best demonstrates an individual’s consent and should be attached to the form.

### **How can we best provide services to students whose participation in Project Search was interrupted or ended early?**

OOD has issued direction to counselors that for Project SEARCH interns who are no longer able to report to the host business site. Counselors should continue to work with each student, guardian, and IEP team to discuss the student’s needs moving forward. As part of these discussions, staff may consider authorizing hourly JSST per recent OOD allowances, either as a standalone service or in combination with Performance-Based Job Development.

### **Will OOD waive the CESP requirement for staff offering Supported Employment Job Development (Tiers I & II) who had the experience to sit for the exam, but whose testing is being postponed by APSE?**

While the CESP requirement for Supported Employment Job Development (Tiers I & II) remains a requirement of this service, provider staff do not need to have a CESP to provide the additional hourly JSST for individuals in Supported Employment Job Development. Staff who have not yet obtained their CESP can provide these additional hourly JSST services.

### **Can providers assist individuals they are working with by helping them file for unemployment or pursuing other resources as a result of job loss during this time, such as through an On-the-job Supports authorization?**

Yes. During this time, OOD is expanding the definition of On-the-job supports to allow providers to bill OOD for assisting individuals they are working with who have interrupted employment to apply for unemployment benefits. This can be authorized as up to 2 (two) hours of On-the-job supports and can include remote support, such as phone calls, Skype, FaceTime, GoToMeeting, and other screen-sharing programs to support an individual in completing an application. Please consult with the individual’s counselor/coordinator to request an authorization and referral.

### **With remote services being approved at this time, are in-person services still allowed? Can providers meet with participants in the community, offices, or homes?**

Governor Mike DeWine’s current Responsible Restart Ohio allows for Human Services Operations to continue to be conducted, including individuals leaving their homes to engage in

services, and also includes Opportunities for Ohioans with Disabilities and its service providers. However, service delivery methods must also consider the comfort level of the participant and provider. OOD understands providers need to make decisions based on the safety of their staff and participants and supports remote service delivery at this time. (Updated on 6/8/2020 to reflect shift from Stay at Home Order to Responsible Restart Ohio.)

OOD is not allowing for services to take place in participants' homes, within their personal vehicles, or in unsecured public spaces (e.g., picnic table at a park). Services that are traditionally authorized as part of an in-home service, such as Activities of Daily Living to assist an individual in improving their cooking skills, are an exception and will continue to be allowed to be provided as they have in the past. Please see update above for more information regarding services in the home.

### **How do we handle an interrupted job search or a Tier III payment that cannot be made due to an individual losing a job or being laid off?**

Work directly with the counselor/coordinator and the individual to determine their needs at this time. This may vary from additional hourly JSST (up to 100 UOS per month), exploring new job goals, or continuing with their job search (which could result in an additional placement). If a participant is expected to return to work, the 90-day count toward Tier III will be suspended until the person returns to work e.g. if the person is at Day 78 of work and laid off but wants to keep the job once called back, they can do that. Once the person is called back, Tier III would pick up at Day 79 and complete the 90 days of stable employment.

### **Can Pre-ETS be provided remotely?**

Yes, Pre-ETS services can be provided remotely, with provider staff working directly with students via phone, Skype, FaceTime, or other electronic communication methods.

### **Is OOD accepting new Pre-ETS applications?**

Yes, OOD is accepting new Pre-ETS applications for those who have attended the required training. An alternative to the in-person Pre-ETS training is being explored.

### **SSA Offices are closed, and there are difficulties in obtaining BPQY's. Will OOD waive the requirement to verify benefits?**

No, the BPQY is necessary to complete a work incentives plan, and OOD does not plan to waive the requirement of the BPQY. It is important to note that SSA will still provide a copy of the BPQY to the individual. Therefore, providers should work with participants to obtain their BPQY by either contacting the SSA Office or requesting it online so that the WIP/CWIC can complete the work incentives plan.

## **How can we support individuals who do not have technology in place (e.g., no Skype, etc.)?**

Some individuals may not have a laptop or home internet connection. In these cases, consider if they can receive remote services through their phones or tablets, such as by utilizing FaceTime, free application versions of Skype, and other video services. In cases where an individual does not have home internet access or a cell phone, please consult with the counselor/coordinator to determine if technology can be supported through the IPE.

OOD will be providing additional guidance on the remote provision of services, including more information on available technologies for providers to consider in implementing remote service delivery.