



IDVR/CRP Meeting Notes – September 18, 2024

Order of Selection (OOS) Update

As of Monday, September 9, 2024, IDVR implemented Order of Selection (OOS). With the implementation of OOS, all disability priority categories are currently closed. IDVR is only serving individuals with approved Individual Plans for Employment (IPE).

All individuals that were in eligibility status at the time of OOS implementation were placed on the waiting list based on two criteria: 1) Disability Priority. 2) Application date.

All individuals that apply for services and are determined eligible are placed on the waiting list by:

- Disability Priority - Most Significant Disability (MSD)
- Significant Disability (SD)
- Disability (D)
- Application Date

(above is the order in which they are placed on the wait list)

If an individual is in “planned service” status with the VR process, they will continue to receive VR services. There is no “hold” on their status.

Community Rehabilitation Providers (CRPs) were informed that if a customer has a question about their case, refer them to IDVR counselor to answer their questions.

Eligibility criteria has not changed since implementation of OOS. Eligibility is based on the number of disabilities and the timeframe in which the counselor determines that the individual is anticipated to need services. For example, a high-cost service with a short time frame, does not put the individual as MSD.

CRPs will inform customers that VR has a matrix and guidelines in which they make the eligibility determination rather than attempting to answer those types of questions.

There was a question as to how PreETS Workplace Learning Experiences are different from general services in relation to the waiting list. CRPs were asked to

refer to the [Order of Selection section IDVR website](#) located on the website, which provides the current information related to OOS.

Disability Rights/Client Assistance Program (DRI or CAP) has had the opportunity to provide language such as Order language and Waitlist language, as it results in plain language to the customer.

An explanation was provided stating that multiple attempts will be made before closing a customer's case, therefore putting the individual on the waiting list if they choose to reapply.

Public Consulting Group (PCG) Rate Analysis Study

Ryan Waddell, IDVR CRP Manager, shared the IDVR Rate Analysis Project recommendations, which includes a summary of their findings. PCG, a national management consulting firm, was selected through a competitive bid process by the Idaho Division of Purchasing. They have worked on similar projects in other states.

Surveys were sent out (to large and small CRPs in 2023), 33 CRP's, of which 11 CRPs participated by completing a cost survey. (64 Non-Profit) and (36 For-Profit).

Services included within the study:

- Assessment Services (Staffing, Site Development, CBWE, Report Writing)
- General VR Support Services (Job Search Assistance, Job Supports – Short Term, Job Readiness Training)
- Supported Employment (SE) (Job Coaching)

Scope of Services of the study focused on key VR services including:

- Rate Calculations - CRP revenue/expenses, personnel roster, time study data, tax calculations
- Goal - Ensure costs included are reasonable per Code of Federal Regulations (CFR 200.404)
- CRP Payment Consistency – Efficiency, Economy, Quality of Care

These services were the most critical in determining cost structure and were used were the most consistent and reasonable to develop a methodology to calculate the rates.

The rate calculations are based on direct and indirect costs including:

- Salaries
- Taxes
- Fringe Benefits

- Operating Costs
- Indirect Organizational Costs

A market salary analysis compared CRP salary data with both Idaho and regional salary data from nearby states.

This allowed for an informed and comparative rate structure. The purpose of these calculations was to ensure that the rates would be economically feasible for providers while maintaining service quality.

The total service hours were also reviewed by comparing the data in the case management system. The average data from the CRPs resulted in an average of multiple fiscal years. The result was an average of units per service.

For example, CBWE based on the data from the average unit is twenty-one hours and that includes 14% for non-direct time. To complete a CBWE, job readiness training (JRT) is a flat fee based on nine hours. JRT on average takes 9 hours. Job Search Assistance (JSA) and Job Support Short-Term (JSST) are paid based on achieving milestones. PCG examines best practices from VR around the country and finds better outcomes with customers with this model.

Rate recommendations were based on a combination of cost studies, market research, feedback from VR, and research from peer states. Assessment service rates are primarily structured as flat fees. For example, \$1760.00 for CBWE, \$760.00 for JRT and then JSA and JST would be paid on milestones. So, you would see for example, milestone one, under JSA which includes resume' preparation, developing interview skills and paying a milestone payment for accomplishing that service of \$239.00.

Then, milestone two, under JSA would mean, the customer obtains employment and pays a milestone payment of \$717.00. So, for JSA, the total service amount would be \$956.00. Similarly, on JSST, paying milestones based after the customer hasn't obtained employment within 15 days after starting a job.

If job search assistance isn't completed, the CRP would get paid \$239.

There would a milestone 45 days and then 90 days for a total service amount of \$1,116.00. SE job coaching services are recommended at an hourly rate of \$60.00 per hour. The projected fiscal impact by analyzing the previous fiscal year's data using (fiscal 2021 volume), the projected increase would be 77%. By using (fiscal 2023 volume), costs would increase by 46%. So, the costs for (2023 fiscal year) would be \$2.78 million. The estimation of total costs for (fiscal year 2024), using the rates developed by PCG, would be \$4.05 million dollars.

(PCG) Recommendations

Implementation Plan

- Establish a feedback loop of CRPs
- Consider phase-in implementation of the rate increases
- Policy enhancements & CRP contracts
- Provide Transparency
- Establish CRP staff qualifications
- Consider external market factors for setting/adjusting rates
- Explore value-based or incentive based payments
- Monitoring CRP costs and milestone data
- Establishing regular rate study intervals

A stakeholder workgroup will be established by the CRPs, with a phased in implementation of the rates. This will provide transparency.

Stakeholder Workgroup

- Address Challenges
- Identify Priorities
 - Services in Rate Adjustment
 - Rate Structure
 - Value-Based & Incentive Payments
 - Certification & Credential Requirements
- Provide Solutions
- 3 CRPs (Rate study participants)
 - 1 Large CRP
 - 1 Small CRP
 - 1 Multi-Regional
- 3 CAP Member
- 1 CAP Member
- 1 DD Council Member
- 1 Person w/ Disability
- Key IDVR Staff

Next Steps:

- PCG Rate Analysis Report
 - Posted on IDVR website
- Form Stakeholder Workgroup (this will be discussed at a later meeting)

This Stakeholder Workgroup will consist of CRPs to address challenges, identify

priority services for the rate adjustment, rate structure and incentive payment. Preference will be given to CRPs that participated in the rate study.

The PowerPoint Presentation will be posted to the IDVR website in the coming weeks. If CRPs are interested in participating.

There was a suggestion that IDVR reach out to neighboring states to gather facts about the milestone structure.

It was explained that the workgroups were established to include an individual with a disability, a DD Council member, a CAP member, and an SRC member. Representation of 3 – CRPs, of which one will be a multi-regional provider will have input as to how they do business around the state.

There was a suggestion that the workgroup structure include a larger number of CRP participation.

The case average is 12 hours for job search assistance. This fee scale is a concern for CRP's because if the milestone was not completed, the fees for the scope of work would still be \$239.00 for milestone one.

There was concern expressed that if a CRP spends up to 20 hours trying to find someone a job and they are not placed, the provider does not get compensated for those hours.

It was confirmed that the data provided to PCG was based on data from Idaho's Aware case management system, regarding hours spent, not authorized.

Ryan provided a reminder that these are recommendations by PCG, and the workgroup will develop their recommendations as well. For some services, this wouldn't be a concern such as CBWE for a flat rate fee. This is not set in stone and could be revised.

It was reiterated that more CRP's should be involved in the workgroup.

There was additional concern expressed that individuals that may need more hours to obtain employment may be left behind because it may not be financially viable for the CRPs to continue the job search.

There was additional concern about short-term job supports because working hours vary based on the individual.

There is no definite implementation date as decisions will be made based on legislative appropriations.

It was expressed that CRP's should not be the minority when these types of processes are implemented but rather the experts. It was further stated that the PCG recommendations should not be the focus over CRP input.

IDVR cannot compensate CRPs time for participation in the workgroup.

WIOA Competitive Integrated Employment (CIE)

If an employer is only hiring people with disabilities, it is not considered CIE. Benefits and compensation the customer would have must be equal to the other employees within the same place of employment and must include a competitive hiring process to all applicants versus hiring only individuals with disabilities. There must also be opportunities for advancement.

VR cannot support individuals in employment that are not CIE.

If there is a question about the vocational goal, contact the IDVR counselor. IDVR cannot support a vocational goal that is not on the Plan for Employment.

CRP Billing

Timely Billing & Authorizations

Beginning October 1st, Authorizations will be issued for one month at a time. Final invoices must be submitted at the end of each month.

An Attestation must be included on the invoice indicating this is an accurate and final invoice.

It is important that invoices are submitted accurately to avoid delays in payment. There have been a significant number of invoices submitted, dating back to the end of last calendar year.

There was a request for a separate meeting to discuss some of the concerns regarding the billing process. The Field Services Chief (FSC) confirmed that there would be a meeting scheduled to discuss the issues.

It was asked what CRP's can do to help with preventing the backlog of payments when once a month billing is implemented.

IDVR will work to ensure that If there are concerns about who to contact, CRPs are directed to work with leadership of that customer support center.

It is IDVRs responsibility to ensure that Authorizations are issued in a timely manner. If hours have been completely utilized, CRPs should not be providing services until a new Authorization is issued. If there is an issue, reaching a counselor, contact the leadership of that VR office to determine what that decision should be.

Questions submitted by those who were not in attendance

- There was a question regarding the update on the Order of Selection and it was addressed that there are a lot of factors that go into this and that IDVR may not have all the answers yet and the agency is in the middle of that process.
- There was also a question regarding a rate study. IDVR will be posting the full rate analysis report on the IDVR website once accessibility remediation is completed.
- There was a request for what percentage of the 2025 fiscal budget has been expended. Nanna Hanchett, Deputy Administrator, explained that the Agency is in the middle of that process.
- Another question was asked whether “applicants” are notified of their right to appeal if they are found not to be eligible for services. A question was asked regarding how and when does this occur.

It was explained that applicants are informed throughout the process. IDVR customers are notified, once at the time of Application, and they are notified again in writing, (whether they are determined eligible or not) for IDVR services. They are also provided with information on how they can request to appeal those decisions. The information is also on the [IDVR website](#).

- Another question was raised about whether agency has met the (RSA) requirements for PreETS expenditures?

It was explained that the agency is in the middle of the grant cycle for that particular year and the agency anticipates that they will be able to meet with the 15% requirement.

- A final question was asked about the status of PreETS and work-based learning. There is a perception that IDVR has suspended authorizing this service.

It was explained that customers are informed of Order of Selection at time of application. Pre-ETS students are still being provided services and it is based on student need and whether they are ready for services.

Ensuring that IDVR is providing necessary services and is not based on whether they have received a work-based learning experience in the past.

- There was a question regarding, who is the lead person or entity responsible for hiring the interim Administrator Position as there was an understanding that this position was removed from the State Board of Education's responsibility.

A correction was made, that it is the Executive Director/Josh Whitworth, of the State Board of Education is responsible for hiring and approving the Administrator Position.

- There was a concern brought up about when the new process started and how will PreETS continue to serve its customers.

It was also questioned whether there was a ranking structure and was it a regional ranking or how is PreETS determining the need for the customers. The request was for clarification, regarding services in need.

Explanation was provided indicating the VR Counselor would meet with the student to determine what the next step would be. Also, just because someone participated in work experience in the past, would not necessarily mean they would participate in a paid work experience in the future. It is really to ensure that IDVR is providing the necessary services, and as much work experience as is possible, while working with as many people as possible. This may require more work up front, from the counselors to prepare them with appropriate, workplace behaviors, work skills, putting them into a different environment such as volunteering to gain some of those additional skills prior to a paid work experience so they have the required skills to be successful in their employment.

Regarding serving PreETS customers, there are five points that IDVR provides for customers to transition.

A work-based learning experience is never meant to be a long-term placement or training, it is meant to provide exposure so when someone is participating in multiple work experiences. IDVR has gone beyond the point of transition services. The counselors should be solely focused on that pre-employment piece. These are based on benchmarks for curriculum and training where the counselors are going into schools to assess where

they are at, so IDVR can provide a service.

Work based learning could be job shadowing or a work experience and there are multiple ways this service can be delivered.

Currently, the PreETS counselors are going into the schools which is being evaluated, along with the structure around the counselors working with the schools. The evaluation of the students is also being looked at. One thing that has been found to work very effectively, is when the students have an open VR case, and they are transitioned to a general VR case, this allows the VR counselors to pivot back to the schools and the students and allows the agency to keep that focus on the student. So, in that context, of how the Pre-Employment and the transition of services is looked at (as well as the general cases), appears to have a positive result. This process will be evaluated and could change, but as it stands today the counselors will continue working with the students in the schools for now.

IDVR has counselors that specifically serve students until they transition to a general VR case.

Additional concerns were raised regarding OSC and vacancies in positions at the central office being reduced. There was curiosity about how HR was handling this situation and there would be re-hiring in the future.

It was asked if OSC affects the delivery of IDVR services.

It was mentioned that people should follow up with Leadership at the Center if you feel there is a need to do so.

The agency is not actively recruiting for all positions, as positions are identified as necessary for the agency to do business, the agency is actively recruiting for those positions.

CRPs were instructed to give as much notice as possible when requesting an Authorization. A 2 to 3 day start date is not feasible, but VR will try to accommodate those requests if absolutely needed. Five days' notice is a more appropriate timeframe.

Lack of uniformity on how billings are submitted is a concern. It was explained that there will be team member training on the billing topic.

Next CRP Meeting

- Every odd number month – 3rd Wednesday
- **November 20, 2024, 2:00pm to 4:00pm (MST)**
- Please submit meeting topics and questions 2 weeks prior – November 6, 2024