

CRP Meeting – Meeting Notes

January 15, 2025, 2:00 pm – 4:00 pm (MST)

RSA Meeting Overview

Matt Markve, IDVR Planning & Evaluation Manager shared highlights from a recent meeting with Rehabilitation Services Administration (RSA).

RSA ADRAN Standards

- In order for IDVR to be reimbursed from RSA for a service or goods, 100% compliance must be met with the Department of Education standards.
- All goods and services IDVR purchases must be 100% ADRAN compliant

A = Allowable under the federal grant if the goods or services are:

D = Documented - The customer record must include justification for the service to address the individual's specific disability barriers to employment for the customer to reach an employment outcome. Documentation includes, cost, customer approval, and outcomes.

R = Reasonable - Services costs must be within "normal" limits for the service type or good purchased and local market prices.

A = Allocable - The services can be charged to our federal grant.

N = Necessary - The service or good is required to address disability barriers to employment for the customer to meet their established vocational goal. Necessary services are need, not a want.

If RSA determines a service IDVR has paid for is not allowable, IDVR must pay for the unallowable services out of state non-match funds. Every unallowable dollar equates to \$3.69 in lost federal reimbursement from RSA of federal funds that cannot be used for program related expenses. For example, if IDVR has \$30,000 in unallowable expenses, that results in over \$110,000 in federal funds that IDVR can no longer use for the program – this is a huge detriment to the program if we are paying for costs that are not allowable under the federal grant.

Once RSA determines that costs are unallowable, there is no way to capture those federal funds.

Communication & Documentation

Matt Markve - In review of CRP communication that was associated with CRP billing, RSA noted repeated Job Search Assistance (JSA) records that contained 15-minute billing entries, and which RSA is questioning the sufficiency of these entries. Services that are less than 15 minutes are not considered an actual service, but rather an administrative cost of doing business.

Communication and documentation are not separately billable. CRPs must account for communication and documentation that meets standards related to the service, are inclusive in the cost of the service, and are within the hours authorized.

For comparison, a one-hour therapy session: A therapist may advise the therapy is actually 50 minutes – the therapist uses the remaining 10 minutes for documenting and charting.

Request for Additional Service Hours

With this heightened level of scrutiny for compliance, counselors are reviewing requests for additional hours and ensuring we are meeting RSA ADRAN standards for authorizing services. CRPs are required to provide justification as to why additional hours are necessary.

Justification should explain:

- How the hours authorized were used.
- What activities you are engaging in with the customer? What is working? What is not working?
- Is the client engaging as agreed on in the JSA staffing?
- Is the need for ongoing job development/coaching hours tied to specific goals not yet achieved?
- Are additional hours supported with client progress data?
- Any other pertinent information

Report Writing

Documenting the service provision is inclusive of the service and within the hours authorized. As an example, IDVR sends a customer for psychological evaluation. IDVR pays the provider for the evaluation once we receive the report; they invoice IDVR for the evaluation service, not the report.

- Report Writing is not allowable per RSA as a standalone service.
- Not billable
- Requests for Report Writing/documenting auth only – Not allowable; must

be for service provision.

- Do not line item “Report Writing” on invoice or Activity Logs/Progress Notes
- Documenting entries need to align with ADRAN standards, e.g.:
Analyzed and evaluated service delivery, documented outcome data, and provided update to Counselor.
- Report Writing limits & Month-End Summary Reports requirement removed from CRP Manual.

CRP documentation must contain information that provides the detail so that justification for the service can be determined. For example, an entry simply indicating “*Job coaching - the customer had a great day*” with one hour of billing does not provide any detail and there is no justification for continued need for the service.

Job coaching documentation should include the following:

- Individualized interventions must be described clearly.
- Documentation must provide the need for ongoing supports.
- The service must be consistent with the customer’s VR IPE goals and needs.
- Any significant barriers to independent employment must be specified.
- Documentation should include any progress that has been made.

CRP Invoices

CRP Manager provided some examples of what should be included in reports and an example of an invoice (see attached).

CRPs must ensure that all service invoices:

- Dates of service provided within the authorized timeframe.
- Type of service provided
- Customer name
- Invoice date (*date invoice was generated*)
- Include unique invoice number
- An attestation that indicates the invoice represents the complete and final billing for the month.
- CRP remittance address
- Invoice “Bill To” address:
Idaho Division of Vocational Rehabilitation
ATTN: [Counselor Name]
650 State St., Rm. 150
Boise, ID 83702
- Include supporting documentation meeting ADRAN standards.

CRP invoices/documentation must meet ADRAN requirements beginning on February 1st (for January 2025 invoices/documentation)

Customer Transportation

The issues with customer transportation were discussed, as it is not an allowable service. This will affect the CRP's ability to provide services. Comparable resources will be explored when discussing transportation strategies with the customer prior to placing them into employment.

When writing a plan for employment, counselors are required to look at things holistically. Counselors are looking at the services that we're providing, and part of that is looking and identifying what is the plan to be able to access the services that we're putting on their plan.

Transportation is a conversation that counselors are having with customers, identifying that, putting that as part of their plan services, and typically outlining that as a comparable benefit for when the customer obtains employment.

It is not an expectation that CRPs provide transportation because the counselor likely already identified what that transportation is for that long term success of that customer. We cannot provide transportation to and from employment.

CRP should ensure that employment opportunities that are being sought after are within the customer's preference for transportation (e.g., walking, biking, driving, commutable distance, time and days that the transportation is available).

If a CRP finds that a customer's transportation situation has changed, bring it to the counselor's attention.

Pre-ETS WBLE Changes

Lauren Noble, Transition Manager discussed Pre-ETS WBLE changes.

- IDVR will need to redo Pre-ETS guidance and the expectations to authorize for services correctly in the manner that it was intended.
- Once the updated information is ready, CRPs that have been approved for the service will be notified.

ASL Interpreters

Mikayla Monaghan, IDVR Business Manager shared information about ASL Interpreter services.

- Under the ADA Employers are required to provide reasonable accommodations for all aspects of the employment process including application, interview/hiring process, and beyond once employed including

accessing the benefits of employment.

- In Idaho, Anti-Discrimination Laws, including the ADA apply to all employers with a total employee size of 5 or more, which is more restrictive than the federal minimum size of 15 or more employees
- CRPs are responsible for notifying the employers of all reasonable accommodation requests needed for the IDVR customer to successfully engage with the prospective employer in the application and hiring process, and once hired. IDVR cannot supplant the requirements of the employer to provide reasonable accommodations for customers to engage in the employment process with an employer that is held to the ADA requirements.
- If an employer has less than 5 employees, and the ADA does not apply, it is still best practice that they provide appropriate accommodations, if they are unable to provide reasonable accommodations, please work with the VR Counselor to identify appropriate next steps to address the customer's informed choice and their accommodation needs to be successful in the JSA activities and beyond with an employer that is not held to the requirements of the ADA under Title 1.

The CRP manual will be updated as soon as possible and will be disseminated to all CRPs.

Questions

Q: If a report was submitted on November 27th and the counselor did not work on them until December 5th and they did not backdate the Authorization to December 1, how does that work?

A: Requests for hours need to be submitted as soon as possible to allow for the review process in order to get the Authorization issued by the first of the month. VR cannot backdate Authorizations as it is not allowed under the federal grant. If the counselor does not respond to your request, escalate the request to the supervisor.

Q: How soon before the first of the month should requests be submitted?

A: At least 10 days. If, for example, there is a need for an expedited Authorization because someone is starting a job in 5 days, then an Authorization other than JSA will need to be issued (e.g., SE:JC). At the very minimum, it can

take two to three days, but it is not realistic to issue an Authorization for a job that starts the next day due to the multi-level process that is required by RSA due to the agency being under special conditions.

Next CRP Meeting

- Every odd number month – 3rd Wednesday
- **March 19, 2025, 2025, 2:00pm to 4:00pm (MST)**
- Please submit meeting topics and questions 2 weeks prior – March 5, 2025