



## CRP Meeting Notes

May 21, 2025, 2:00 pm – 4:00 pm (MST)

### **LSO Single Audit Update** - MiKayla Monaghan, Stakeholder Relations Manager

IDVR was included in the single state audit, which started in late April/early May. There is no known timeline for completion of the audit at this time by IDVR.

### **IDVR Office Consolidations** – Darrell Quist, Field Services Chief

- **Idaho Falls** – 2 offices consolidated
- **Meridian** – Will close, merge with Boise
- **Rexburg** – Will not renew lease in 2026
- **Preston** – Closed
- **Sandpoint** – downsizing office space
- **Lewiston** - downsizing office space
- **Blackfoot** - space has been reduced

Office closures will help to reduce costs. It is not the intent to reduce staff, however the intent is to reduce overhead costs. IDVR continues to serve the same areas across the state, which can often involve team members traveling to areas where there is not a VR office.

IDVR is currently serving 2,256 general/traditional open cases. It is anticipated that there is sufficient funding to serve the current cases. IDVR is currently spending under the Fiscal Year 24 funds, a portion of which was the \$10 million that RSA provided.

**Question:** Has the number of people being served increased or decreased?

**Answer:** There have not been any additional participants added to an Individual Plan for Employment (IPE) since the agency implemented Order of Selection, therefore the number of individuals being served has decreased due to cases being closed.

**Question:** What is the plan to spend the \$2.7 million to open up this year's budget?

**Answer:** \$1.7 million supplement was to pay for items that IDVR paid for but were charged against the federal award and were not allowable expenses and therefore had to be paid with state dollars.

\$2.7 million is not related to the \$10 million provided to IDVR by the Rehabilitation Services Administration (RSA) because the state funds that were going to be available to capture the Federal Fiscal Year 2025 (FFY25) Award were used to match the \$10 million. Due to this, IDVR did not have state funds to match the FFY25 award until granted the \$2.7 supplemental during this legislative session. Now that IDVR has state dollars to match the FFY25 award, IDVR can start matching the award to be able to look at spending from the FFY25 award.

**Question:** What money was used to pay Vaybrant Consulting?

**Answer:** The contracted vendor was paid from the \$10 million dollars as approved by RSA.

**Question:** Why is IDVR still in Order of Selection?

**Answer:** The FFY25 award cannot be spent until the FFY24 Award is closed out and until IDVR had state dollars available to match the FFY25 award. Once IDVR begins to match the FFY 25 award from the supplemental, then the FFY 25 funds can be drawn on. In order to serve individuals on the waitlist, IDVR has to ensure that there is enough funding to sustain the life of the case. IDVR is currently in the process of doing projections to determine when we can begin serving individuals off the waitlist.

Another factor is that IDVR does not know how much will have to be paid back to RSA for disallowed expenses that were charged to the

grant with the 5-year forensic lookback that is currently being completed.

It was explained that if there were not enough funds to continue serve the individuals with a plan for employment, it would put the agency in another area of non-compliance that would effect funding.

### **Legislative Intent Language – MiKayla Monaghan**

The legislature provided specific language that must be followed:

- Most Significant Disabled individuals (MSD) must be served first. This language aligns with the State Plan and federal requirements for Order of Selection.
- No more than 17% spent on Pre-ETS. It is important to understand that the expenditures include Authorizations and IDVR staff salaries that coordinate and deliver Pre-ETS services. The salaries and benefits get charged against the federal award toward the 15% requirements.
- Reporting to JFAC on CRPs (due December & June)
- CRP contracts are required by Idaho legislature and RSA.
  - IDVR is currently working with the Idaho Department of Administration to support the contracts process because the threshold for spending for CRP services requires the agency to comply with the Division of Purchasing requirements.
  - The goal is to have the contracts approved by RSA and implemented by July 1, 2025.

**Question:** Is it the intent of RSA to include staff salaries as part of the PreETS expenditures?

**Answer:** Yes, RSA reimburses IDVR for salaries and Pre-ETS salaries are reviewed separately and attributed toward the 15% minimum Pre-ETS spend.

**Question:** Why doesn't IDVR reduce staff salaries?

**Answer:** IDVR is not limiting the services to students but rather are working to expand the services through staff delivered model that was shared at the recent SRC meeting. It is a staff-delivered model to

support compliance with the intent language provided by the legislature for the 17% maximum Pre-ETS spend.

It was stated by CRP that the staff-provided services appear to be a higher cost than vendor-provided services. IDVR responded indicating that under the current delivery model for Pre-ETS, IDVR is seeing an increase in students served and services provided.

**Question:** What Pre-ETS services were not compliant?

**Answer:** One of the things that was problematic related to students who receive services from CRPs in that they must be in an Individualized Plan for Employment (IPE) as the services provided with CRP's include support services in addition to the Pre-ETS services provided. However, RSA has encouraged the utilization of Pre-cases and then eventually moving students into the traditional case type. The way services were authorized was done incorrectly in previous years and did not align with federal requirements.

**Question:** When you are in the schools, how are you ensuring that duplicate services are not being provided to students within the school setting?

**Answer:** IDVR takes great care to ensure that services are not duplicated and that IDVR supplanting the schools responsibilities for service provision or providing services that fall under the responsibilities of the school by law. There is a clear delineation between VR responsibilities and school responsibilities when providing transition services that VR ensures compliance with .

**Question:** In the past, contracts with other agencies have allowed CRPs to be involved in the process. Will IDVR follow this model of contract development?

**Answer:** The rate implementation stakeholder workgroup, which includes CRP representation from four different CRPs (CCI, Journeys, OUI, & DWI), has been engaged in the process; however, IDVR is on a tight timeline to submit the CPR Manual and contract templates to RSA in an expedited timeline. The main priority is to ensure that the federal corrective action plan (CAP)

requirements/deadline will be met. Work with the stakeholder work group will be continued on an ongoing basis.

CRPs were encouraged to contact Lauren Noble, Transition Manager for additional Pre-ETS questions.

**Question:** Numbers being provided to CRPs are based off people that would qualify in those school districts and your staff are going and informing in this the school what's available and counting those numbers or are they actually participating in the services related to pre-employment? What is Pre-Case?

**Answer:** A Pre-Case provides the opportunity for IDVR to provide Pre-ETS services to students who are determined "potentially eligible" under the federal definition of a potentially eligible student. The student has to have a Pre-Case or a general/traditional case to receive VR services whether it be a transition service or a planned service. The Pre-Case does not require that a determination of eligibility is done to provide services, and it does not require an Individual Plan for Employment (IPE). To serve a student with a disability, IDVR has to verify that there is a disability and/or that the student has or qualifies for an Individualized Education Plan (IEP) or a 504 Plan. This is often done with a signature from the school indicating that the student receives or is eligible to receive services under an IEP or 504 plan.

## **CRP Manual Update**

- The CRP Manual will be released once RSA has approved it and it is ready for publication. The goal date is July 1, 2025 pending RSA review and approval.
- A meeting will be scheduled with all CRPs to review the changes.
- The manual will be in alignment with RSA requirements to ensure grant compliance .

**Question:** Are you looking at the amount that is being spent on CRP services?

**Answer:** Yes, IDVR has mechanisms in place to track services provideve by CRPs and by category of services. Services provided must

be specific to an individual's needs and meet the federal requirements that define allowable services under the grant award. As individuals begin to be served from the waitlists, there will be an increase in referrals to CRPs as participant needs are identified.

**Question:** Will IDVR provide job coaching when CRPs can no longer provide the services because they can't afford to hire a job coach?

**Answer:** As has always been the case, if a CRP is unable to provide job coaching because of a capacity issue, the individual can be referred back to VR and would then be referred to another provider to provide the SE Job Coaching service.

### **Unbillable Activity - Per RSA (Recap)- Ryan Waddell**

There are items that are continuing to be seen in invoices and accompanying reports. CRPs were reminded about the following are unbillable per RSA:

- **Communication** – (e.g., calling/texting to set/confirm appointments; checking-in)
- **Daily/monthly documentation** – Documentation of the service is inclusive within the cost of the service (not separately billable, cannot add additional time to the service).
- **Administrative tasks** – Examples:
  - Generic job search (not participant specific; does not result in actionable activity for a specific participant.)
  - Reviewing referral information
  - Scheduling appointments with participants or VR team members
  - Collecting signatures on paperwork
  - Training and/or onboarding new staff on participant cases
- **Generalized activities** (e.g., activity log entries such as *submitted applications online; called prospective employers*)

Only actual JSA/job coaching is billable (e.g., JSA: if no actual job search was provided - not billable)

Activity logs need to be specific and include the next steps and what follow-up is needed.

For example, under a JSA authorization, if no actual job search is conducted, it would not be billable. If JSA is clearly documented, specific to

the participant being served, and is an allowable service/cost, that can be billed to the grant.

IDVR continues to work with RSA to determine exactly what is allowable and will have additional information to review when the new CRP manual is published.

- Documentation is being rejected when hours are billed for contacting various employers with no specifics or doesn't indicate the name of the employer.
- The services need to be in line with the participant's vocational goal and employment preferences (as agreed on the Job Placement/Support Services Agreement).

**Question:** How quickly can we get to a rate that will include the services being provided?

**Answer:** The current rate for CRP services is \$54 per hour. CRP services include Job Search Assistance, Short-Term Job Coaching, Supported-Employment Job Coaching. A CRP's administrative activities are not a service and cannot be paid by the federal grant per IDVR's technical assistance with RSA. RSA has been clear that the cost of administrative amounts cannot be billed separately, or additional time added to cover the time spend completing administrative activities that do not align with the definition of the authorized service.

IDVR is currently working on CRP contracts and CRP manual for RSA review. The goal is to have new rates in place by July 1, 2025, however it is dependent on RSA approval.

IDVR was asked to provide written documentation from RSA indicating that documentation is not a billable service allowable under the federal grant.

### **Submitted CRP Questions**

**Question 1:** How many people are currently on the waitlist?

**Answer:** 2,581 as of 5/21/25

**Question 2:** When is supplemental funding being released and where is it being used?

**Answer:** See above answer for this question earlier in the meeting.

**Question 3:** Why is VR operating on last year's funding while there is a wait list? That was not very clear. Any update on the waitlist being released?

**Answer:** See above notes where this was answered earlier in the meeting.

**Question 4:** There have been many instances where 5 hours per month does not cover the client's needs - even with updated emails sent on time and with plenty of justification. Some Counselors completely understand and some do not. For example, under JSA applications are completed, then employers request interviews, and the client needs prep and interview support. That leaves very little wiggle room and clients are going unsupported, hurting their chance of gaining employment and it makes it very difficult to explain to the client that we are unable to support them. Also, with a 10-day lapse, there have been instances that if the client does obtain a position, they are going unsupported, and the employer feels like we dropped off the face of the earth and that hurts the VR program overall and can impact other clients.

**Answer:** Training is being provided to team members to streamline the process moving forward and includes how authorizations for ongoing services take place.

The guidance that was provided to counselors and managers is that authorizations need to be issued with realistic projections of what is going to be used within the month. The agency must be careful not to encumber funds that won't be utilized as it makes the task of fiscal forecasting more challenging and less accurate.

If CRPs have consulted with supervisors and are continuing to see that authorizations are being issued for most participants with a 5-hour limit or other systemic issues, send Darrell the authorization number for his review at [Darrell.Quist@vr.idaho.gov](mailto:Darrell.Quist@vr.idaho.gov).

There is an expedited process for issuing Authorizations if someone has been offered a job that starts within the week. However, authorizations



cannot be issued within a 24-hour period. If you are unable to contact the counselor, contact the supervisor. If a change is not seen in the a counselor issuing a standard 5-hours per month, let Darrell know.

External Resource: Danielle Larson from Rise shared a resource that they use for staff interview scheduling called Calendly.com, that has decreased the number of no-shows for interviews and appointments.

### **Next CRP Meeting**

- Every odd number month – 3<sup>rd</sup> Wednesday
- **July 16, 2025, 2:00pm to 4:00pm (MST)**
- Please submit meeting topics and questions 2 weeks prior – July 2, 2025