

CRP Meeting Notes

July 16, 2025, 2:00 pm – 4:00 pm (MST)

Rate Study Stakeholder Workgroup Update – Ryan Waddell

Providers were reminded that the format for this meeting is for programmatic and systemic issues and individual cases should be discussed offline with Ryan.

The rate study workgroup meets biweekly on Thursdays. This is a summary of what they have been working on.

- **Billing timelines, Fee indicators for Outcome Payment Requirements, and Incentive Payment Parameters**

The workgroup is establishing billing timelines, fee indicators for outcome-based payment requirements; CRP performance incentive payments and the incentive parameters for placements that have outcomes such as higher wages, hours worked, employer provided benefits, rural placements, rapid replacements.

- **Documentation consistency and Common Language/Solidifying Documentation** – solidifying documentation for after the job placement initial staffing, JSA initial staffing with the counselor, participant and CRP including anyone else on the individual's team. The CRP would need to submit an employment plan.

A suggestion was made that an increase in the current payment structure should not be implemented until after IDVR moves into a milestone payment system and to focus on implementing the new milestones as a priority.

RSA Corrective Action Plan – Update – MiKayla Monaghan, IDVR Stakeholder Relations Manager

- **CRP Manual** – IDVR is waiting for RSA's approval of the CRP Manual. RSA has provided some feedback with questions and clarifications that will be provided back to RSA, which is currently in process by IDVR leadership. The intent is to ensure that everything is clear and documented throughout the Manual and making sure there is no ambiguity within different sections and how that information applies in practice.
- **CRP Contracts** - Following RSA-approval of the CRP Manual, IDVR will enter into contracts with CRPs. It is anticipated that a new model will be in place by **October 1, 2025 (aligned with Federal Fiscal Year and contingent on RSA response timelines)**. The contracts should be ready to send out in advance of the October 1 deadline,

which would give CRPs plenty of time to review the updated manual and associated contracts. IDVR must remain in compliance with State Purchasing Regulations as well as Federal Grant Regulations.

The stakeholder rate study workgroup has had the opportunity to provide feedback on the Manual, which was determined to be more efficient than having multiple workgroups. There were concerns expressed that not all CRPs are being provided with the opportunity to have input. The workgroup has a Code of Conduct to ensure that their organizations and constituents are appropriately informed of the group's work. Clear communication aligned with agreed protocols is essential.

Fading Supports – MiKayla Monaghan, IDVR Stakeholder Relations Manager

- IDVR cannot pay for CRP Services related to participant safety/legal issues. Examples were provided where the same agency may be providing multiple services such as providing direct line of site observation. The job coaching part may fade as they learn the job but the other service would remain intact as a legal requirement, but is not billable to IDVR for those non-job-related activities/time spent.
- Fading – RSA is very clear about the allowability of funds for job coaching services and it has to be tied to the actual needs of the individual in their employment and ensuring individual is successful in their place of employment and cannot be dictated by a legal requirement or any other requirement not tied to support on the job/their tasks.
- The CRPs must be evaluating what the needs on the job are in order to determine level of support and fading strategies.

Authorizations & Hours – Darrell Quist, Chief of Field Services

- **IPE Plan Hours**
 - **Individualized, based on need**
 - **Unused Hours** – unused hours on an Authorization cannot be reissued. A new Plan with hours must be implemented when all of the hours on the Plan have been issued. This eliminates the possibility of using additional hours that are not justified on the Plan and having overbilling.
 - **Expedited authorizations:** Can be provided in order to ensure that services are not delayed for the participant, however it should not be a standard practice as CRPs should be submitting plans for the upcoming month a couple of weeks ahead of time.
 - **5-hour Authorizations** – if Authorizations are not sufficient to conduct the necessary services and CRPs are seeing increments of 5 hours rather than what is requested and

justified for the month, notify Ryan Waddell or Darrell Quist and they will address the situation on a case-by-case basis. If it is not a statewide issue, the counselor(s) involved will be contacted to ensure that this is corrected. This was reiterated recently during a meeting with IDVR leadership, and it should not be a continued practice. It was also reiterated that if IDVR isn't provided specifics on the issues, it is difficult to correct the concern as group messaging about something one or two are doing is not effective.

- A concern about cases being closed with CRP's and not being communicated in advance was discussed and CRPs were asked to address those situations with local leadership or Ryan Waddell if they are seeing this happening.

Authorizations – Included Terms & Conditions – MiKayla Monaghan

- **Required contract language on the Authorization** – Authorizations will now have additional language regarding the State of Idaho requirements related to the restriction of use of state funds for purposes of lobbying, dealings with China and training on or performing abortions as provided by the Attorney General's Office.

Submitted CRP Questions

Summary of value added for the \$2 million contract between VR and Missouri- how has this investment moved VR closer to being able to serve the waitlist. (MiKayla's answer below)

The contract between IDVR and Vaybrant Consulting for the services they are providing the value of the contract with Vaybrant is that the agency is still open and that we are still functioning and serving individuals in Idaho. Without the contract in place, the federal government (RSA) was looking at how were they going to work with Idaho with the corrective action and the level of concern that they had for our financial situation that we had last year as we were in a very precarious financial situation as Darrell Quist previously indicated. Historically, they have done what is called a fiduciary agreement, which is also an agreement that the agency has to pay for off the top of their grant funds, and so it is not something that is NO cost to the agency. However, RSA had not had a situation where there was a VR program that was siloed with the level of concern that they had with where we were at last year, and that it wasn't tied into the other WIOA partners. There is a territory that has been in a fiduciary agreement and that they are managing all of the WIOA programs and all the billing and decisions have to go through that fiduciary agent through and up to the federal government. That was not something that RSA wanted to embark on with a state of Idaho size and where the complexities and concerns. The decision of RSA to look at an agreement that IDVR could engage in to ensure that

IDVR had the supports needed to be able to continue to move forward while meeting the requirements of the specific conditions that RSA was setting on IDVR for reviewing of our policies and procedures, making those updates to ensure federal compliance, the route payment that we accepted as a term to accepting the \$10 million reallocated funds from RSA and so it was really for the purposes of making sure that we were able to move forward with all of those requirements that were in place of the agency at that time last year, which is also why the timeline for the one year that was also recommended to give the agency time to work through the issues and concerns, work on new policies and procedures, all of those things so that we can get into compliance and then move back to being able to operate the agency in the way that we are used to, without that consultation support from Vaybrant, that was mandated at the level that RSA was indicating for them to be involved within reviewing all of our reimbursement requests as an example.

They are also working with our team to review and assess policies and procedures to make sure that we have all of our policies and procedures reviewed and ensuring federal compliance with the grant requirements. And then that work is also being done in collaboration with RSA because as Vaybrant is a consulting agent, they are not RSA, they cannot make the decisions for RSA, and so everything still has to go through RSA for their review and approval for us to proceed and move forward with those changes that we're working with Vaybrant on.

How this investment is moved at VR closer to being able to serve the wait list? (MiKayla's answer below)

Within this Vaybrant and RSA, we've been working collaboratively with both of them and our goal is to ensure that we have all of our policies and procedures updated and reviewed and approved by RSA and we are currently working with RSA and have been discussing, discussing our projections for when will be able to serve off the waitlist. RSA has been very clear with us that they want to ensure that we do not incur any additional unallowable expenses, and so they are working with us very closely for our goal of being able to open up and begin to serve off the waitlist. We are working very closely and collaboratively with RSA to make sure that we can have all of the work done that needs to be in place before we open the waitlist and begin serving off the waitlist so that we can assure as an agency that all of those expenditures that we make when we open up the wait list will all be allowable and reimbursable as if we don't have that understanding that RSA and IDVR are both in alignment that we have everything the way it needs to be with allowability for all of our services across the board, not just CRP services, it's looking at the agency as a whole and all of the services that we provide that they don't want us in a position where we have to stop serving from the waitlist again because we have things that have not been addressed and is creating new unallowable expenses that would impact our ability to continue to serve those that we

pulled off the waitlist and then continue to serve other individuals that we would like to continue to take off the waitlist.

The origin and clarity of current VR rules and regulations- general CRP confusion on where the regulations come from. Are they feedback from RSA or the contract between VR and Missouri? (MiKayla's answer below)

All the work that we're doing, we are working with Vaybrant on our day-to-day work that we're doing with reviewing all of our policies, procedures, processes, allowability, scope of how we pay for services determine an allowable amount to pay for a service. But all of that information ultimately then and goes up to RSA, for RSA's review and approval, and so it is a, not an either or it's in collaboration that we're working with both entities for all that we're doing and it all ties back into our corrective action plan and our specific conditions that we have with RSA of having that good collaboration for the day to day with Vaybrant and then with RSA as We have policies, procedures, processes that we have completed. We have in a final draft form that we would like to send up to RSA so that they can review, provide us either approval or comments or clarifications that they would like to see to ensure that we have everything exactly as we want it so that when we're moving forward again, everything will be allowed and we won't incur any additional unallowed expenses.

The use of staff wages to meet the required Pre-ETS spending totals- Concerns that we will see less students accessing community integrated work experiences (unless VR is putting these students into these experiences themselves) (Lauren Noble, Transition Manager's answer below)

The use of staff time for Pre-ETS has always been included in the costs associated with Pre-ETS allowable spending. Since the beginning of WIOA, in 2014, the time spent directly providing, arranging, or coordinating any of the Pre-ETS activities has been included in our percentages needed to meet that 15 percent.

For this next state fiscal year, the 17 % intent language requires us to account for staff time within that ceiling. We have to ensure that the time that our team members are spending within Pre-ETS (coordinating, planning, delivering services) and the amount that we're spending with purchased services does not go over that 17 % limit. As we moved forward, IDVR team members continue to provide work-based learning experiences as WBLEs are not synonymous with short term paid work experiences.

There are many types of work-based learning experiences, which could include job shadows, informational interviews, volunteering, mentoring, participation in career-related competitions, and short term paid work experiences. The students who are involved with VR continue to access

different types of work-based learning experiences, including some of those short-term paid work experiences if they are able to have the natural support identified on the job themselves.

With that said, we know that individual paid work experience and the supported short term paid work experiences are absolutely necessary. They are valuable and important as we move forward and very beneficial to skill development for students. We do anticipate these to be available to students who need that type of work-based learning, but we have to ensure that those individual work experiences that we've historically paid for are done in accordance with RSA standards and they're done allowably.

We are working on aligning how we are authorizing and what our procedures look like for a CRP work experience, and the goal is to have this type of experience for students available within the Fall timeframe. There are steps that have to be put in place first in order to make sure that things are done allowably. We recognize the need and value that these bring to students' skill development. We do anticipate that this service will come back and CRPs that are interested in providing short-term work experiences should contact Ryan Waddell so they can be onboarded and able to move forward once this service is available.

Ongoing discussions about bringing more services in-house- Does VR see continued use for CRP services? (MiKayla's answer below)

IDVR absolutely does see value and need for continued relationships with the providers that we cannot do the work that we're doing with the individuals that we're serving without a community provider population and that we need the services that CRP's provide to our individuals for them to have access to the services that they need to be successful in employment. And I did want to reiterate that sentiment from the prior meeting. I know I expressed that very deeply at the last meeting and that sentiment still continues. That has not changed with IDVR, and in fact, as we're continuing to do more and more work on assessing of our ability to start serving individuals off the waitlist, it becomes even more important for our relationships and our communication with our CRP community to continue and grow and work on strengthening our communication and relationships across the board with our very valuable community group, that you are all a part of, because as we're serving off the waitlist, we are federally required to serve the individuals of most significant disabilities first.

We know that there's a very high and strong correlation between our individuals that have most significant disabilities and the services that CRPs are providing and the value of those services for those individuals in reaching their successful employment outcomes. We are invested 100 % in making sure that we have good strong working relationships, that we have communication, that when there's issues that we need to be made aware of them.

It's because we want to make sure that the participants and their outcomes and their successes are always at the core and the center of everything that we're doing. And that means that we need to have good providers, that we have good strong working relationships with are able to provide those services and those supports to those individuals.

We all have a very similar core mission and vision to IDVR that we want to see the success of the individuals that we serve in employment and that they are able to benefit from that employment and that the employers that they're working for value their contributions as an employee in the workforce.

We need all of the support and teamwork and collaboration and communication that we can have with this group so we can continue to serve that population of our participants effectively and efficiently with high quality services so they can reach their vocational goals.

Once you release the waiting list, is it ever going to be like it was before where we help everyone that qualifies for services? (MiKayla's answer below)

The way that Order of Selection works is that VR agencies have to be able to expect that they can serve all individuals that will walk in the door to not be on Order of Selection. And that means all of the financial obligations that come with serving that individual over potentially multiple year cases that that individual may have and a variety of services that they may need because, the federal regulations are very clear that the VR program is not allowed to deny services to someone in a plan for employment based on the cost of that service. And so, we have to look at is the service necessary? Is it appropriate? Is it reasonable? All of those things and is it going to move them forward in their vocational service.

There is a plethora of other services that VR provides such as assistive technology, van conversions, which can be very costly. e.g., their van conversions that can cost upward of \$200,000 for a single van conversion, and that is an allowable and required service that the VR program has to provide when it is documented as reasonable and necessary to support that person in reaching an employment outcome. With all of the complexities of being able to budget for individuals and all services that they need to reach their employment outcomes, it creates a lot of difficulties with doing those projections. IDVR will always be looking at moving forward and evaluating our ability to serve all of the individuals that we are currently working with and anyone else that could walk through the door and apply for services that day, the next day, in a week, in a month and in six months. It creates a lot of need for our program side and our fiscal side to be working very collaboratively to ensure that funds are being managed appropriately.

We must serve individuals in the most significant disabilities (MSD) category first and that means we have to be able to fully open that category and be able to serve everyone that is putting that disability priority of most significant disabilities (SD) that are currently working with IDVR. In addition, we must be able to serve anyone else that walks in the door and applies for services that will also be rated within that category.

Once we are able to say yes, we have the funds and the resources to be able to serve all individuals that are currently in plan with IDVR, that are MSD, and anyone that we would expect to walk in the door that is going to apply for services be determined eligible for services and then their disability priority is MSD as well- then once we can project that we have the capacity to do that, then we can begin serving off of the next disability priority, which is significant disabilities before the last category of disability (D).

If a vocation rehabilitation program does not have the financial projections that they can serve all individuals that walk in the door, then the agency stays in Order of Selection until the time that they have the ability to project that they could serve any Idahoan in or anyone is available to work with IDVR that would be eligible for our services.

The need for us to stay in Order of Selection in that capacity of being able to turn the waitlist on or off for the different disability priority categories at any given time based on the financial projections of the agency, but it doesn't mean that it's always order selection all categories closed. That is just one phase of Order of Selection.

Individuals will be served by category and date of application.

Next CRP Meeting

- Every odd number month – 3rd Wednesday
- **September 17, 2025, 2:00pm to 4:00pm (MST)**
- Please submit meeting topics and questions 2 weeks prior – September 3, 2025