

VR Fee Schedule Update 2022



OOD has met with stakeholders at five regional VR Fee Schedule Listening Sessions and two provider stakeholder focus groups. OOD has also reviewed written feedback. Below is a summary of the feedback and response following those discussions.

Feedback	Response
<p>Remote Services Providers noted that having remote services as an option for participants based on their needs and preferences was a great way to engage participants, though was not the best modality for all participants and all needs. Many noted that customer service, participant preference, and the nature of the service or meeting must be considered. While part of all standard rates includes mileage, providers requested that remote service rates not be lowered from standard rates.</p>	<p>OOD will develop VR Fee Schedule language to outline Remote Service provisions as an ongoing modality for most service delivery based on individual participant need and consent. Much of the interim guidance related to remote service provision will be moved into the VR Fee Schedule. OOD will review opportunities to reduce the requirement of provider signatures where attestation may be sufficient. Rates for remote services will not be reduced from standard in-person rates.</p>
<p>OOD received positive feedback on the proposal of new Bridge Support Services (wrap-around services) designed to enhance participant engagement, offer further diversity, equity, and inclusion, and to focus directly on employment supports.</p>	<p>Bridge Support Services will be developed for the VR Fee Schedule to include short-term activities such as assisting participants with obtaining or replacing ID, setting up bank account, obtaining interview or work clothing, and connecting with resources in the community (e.g., accessing childcare, addressing homelessness) to address significant barriers. The rate for these services will match the On-the-Job Supports rate.</p>
<p>Intake</p>	<p>OOD will draft VR Fee Schedule language to note the expanded use of Intakes beyond providers</p>

<p>OOD asked for feedback on expanding the use of intakes to relate to the specific service being provided as part of more consistent customer service and participant experiences. OOD received a consensus of positive feedback.</p>	<p>with credentials and certifying/review bodies which require this service and an overview of confidentiality, ethics, and dispute resolution.</p>
<p>Supported Employment Job Development (SEJD) for individuals with Developmental Disabilities was discussed, with consensus that the model requires providers to deliver the follow along services after OOD case closure. This allows for continuity of care for participants to receive any necessary follow along from the same provider who is already familiar with the participant, their strengths, any challenges, the work tasks, the work site, and the employer contacts.</p>	<p>Language will be added to clarify the service model for Supported Employment Job Development requires the provider who is dually certified with DODD to be able to provide follow along after OOD case closure.</p>
<p>Pre-ETS (subcategory services) Providers noted that they believed these services were very valuable to students with disabilities, but asked that OOD consider further consideration for Intakes, compensation for coordinating services with students, families, and schools, and a higher rate to reflect the complexities of these services.</p>	<p>OOD is considering an Intake (for VR cases), as well as a Pre-ETS Site Coordination fee and a base Pre-ETS rate increase of 8%. OOD will also add clearer language that “soft caps” of hours are not hard caps, and that based on individual need and referring counselor approval, additional hours can be authorized.</p>
<p>Summer Youth Career Exploration and new proposed option for Summer Youth Work Experience. Providers noted low utilization of the Summer Youth Career Exploration service and the highly involved preparation required for the service. Providers were interested in having the flexible paid work experience as an option for participants who were not yet ready for the five-week Summer Youth Work Experience service.</p>	<p>OOD will replace the Summer Youth Career Exploration service with a new option for paid work experience service. This will be a variation of the Summer Youth Work Experience service with fewer and more flexible hours and students will receive a wage stipend for their work performed. Students interested in career exploration may still be referred for individual Career Exploration services and Pre-ETS Job Exploration Counseling services.</p>
<p>Language for Transition Services Providers agreed that there may be opportunities for more simplified language for Pre-Employment Transition Services to better help community stakeholders understand and participate in services.</p>	<p>For clearer language and ease of communication with students, families, schools, and other stakeholders, “Pre-Employment Transition Services” will be renamed as “Youth Foundations of Employment” services. Additional language refinements will be explored to be more accessible to community stakeholders.</p>
<p>Work Incentives Planning Feedback from providers suggested that the current flat fee rate of \$343.00 could be increased to account for situations in which it took longer to access all paperwork, obtain a</p>	<p>OOD is considering increasing the flat fee rate to \$471 to reflect the complexities of this service as well as the qualifications and skills of the staff providing this service. This increase is a 37% increase in the flat fee.</p>

<p>copy of the BPQY, write the report, meet with the participant/family to staff the report.</p>	
<p>American Sign Language Interpreting Providers requested that OOD consider adding a shift differential for interpreting that is provided in unusually late or early hours, and to also consider widening the four-hour cancellation window.</p>	<p>OOD will be adding a shift differential for ASL Interpreting that matches that of the OTJS shift differential. OOD is also expanding the cancellation window from 4 to 24 hours to better align with industry standards.</p>
<p>BSVI/Credentialed Services OOD expressed interest in adding the credentials of Optometrist and JAWS certification (e.g., Freedom Scientific) to approved credentialed rates. Providers expressed challenges with travelling across multiple counties and requested compensation beyond the Service Area Modifier (SAM) rates.</p>	<p>OOD will be adding these credentials for credentialed rates. OOD is also creating a “Critical Need Rate” that goes beyond the current Level III SAM rate and would be an enhanced rate for providing services for a list of underserved counties with little or no in-county or nearby service providers. OOD will determine what counties/services qualify for the Critical Need Rate.</p>
<p>“No Shows” and Cancellations Providers requested consideration for “no shows” and cancellation fees. Some providers noted that there are fewer “no shows” when meetings are scheduled remotely, as this helps eliminate transportation and travel cost barriers.</p>	<p>OOD understands the business impact of “no shows” and cancellations. Rehabilitation Services Administration (RSA) has indicated that the payment of cancellation fees is not allowable using vocational rehabilitation funds. Consistent with RSA’s position, Ohio Administrative Code (OAC) 3304-2-52 (E) prohibits such payments: “OOD shall not pay for missed appointments or other goods and services which have not been provided...” OOD only pays these fees for ASL interpreting as outlined in the OAC. OOD encourages participant meeting reminders and offering remote meetings to reduce the likelihood of “no shows.”</p>
<p>Mileage There were some requests for OOD to consider taking mileage out of the base rate and to have this as a separately billable service, as it had been organized in the past.</p>	<p>Mileage is currently 3.43% of the base rate of services. OOD is not inclined to take this out of the base rate, resulting in lower rates, and greater administrative burden with separate mileage logs and reporting.</p>
<p>Texting Providers noted that many participants communicate via text as a preferred communication method and asked OOD to consider fees for texting.</p>	<p>Texting is understood to be a popular mode of communication that some participants prefer. Due to the brief nature of texting and a current minimum 6-minute Unit of Service, OOD is not inclined to bring additional administrative layers to communication outside of the service (e.g., reminder texts) which can be part of the administrative and communication process ahead</p>

	<p>of conducting services which is captured in the service rate.</p> <p>OOD is considering allowing for texting as part of a service in very limited circumstances, such as when texting with a participant as part of the OTJS service to be billed in line with current accommodation allowances (5 texts equal to 1 UOS).</p> <p>OOD will also allow texting to be utilized during Tier III services to make the required interactive contacts to meet that service goal.</p>
<p>Overall Rate Increase While not a complete consensus, providers overwhelmingly preferred that OOD review Employer Cost Index (ECI) rates which consider inflation and employer costs (such as employee healthcare) rather than cost reporting. Providers noted that cost reporting can be time intensive, and that the process is not preferable for this VR Fee Schedule update, with the target implementation date of October 1, 2022.</p>	<p>OOD is considering a 2.37% general rate increase, in addition to other updates and increases noted above. Providers generally preferred looking to an established ECI rate increase over the cost reporting process. This ECI reference point is used in conjunction with OOD’s overall budget allowances. This would be an estimated additional \$1.49 million in service investment per year.</p>
<p>Transportation Providers requested consideration of raising the transportation rate given current gas prices and inflation.</p>	<p>The service of transportation will receive the 2.37% increase as other services as part of the “across-the-board” rate increase.</p>
<p>Start Up Providers expressed support for expanding the definition of Start Up services to allow for support beyond initial set up.</p>	<p>OOD plans to draft language to expand the use of this service.</p>
<p>Self-Employment Services OOD is considering adding Self-Employment services to the VR Fee Schedule for standard rates with benchmarked rates to allow for payment when entire service is not completed.</p>	<p>OOD will be meeting with service providers of Self-Employment services to discuss proposed models and rates for Self-Employment services.</p>
<p>Non-Permanent Job Development Providers requested a different model for non-permanent job development to reflect and reward the effort it takes to find these placements.</p>	<p>OOD has considered alternate models for non-permanent job development and as we continue to move to year-round services to support students in temporary jobs, internships, and other endeavors. As these efforts continue to evolve, we will continue to monitor and review how OOD authorizes for these services.</p>