

100.00P Consumer Involvement Procedure

(February 2007)

See corresponding policy: 100.00 Consumer Involvement Policy

Note: Vocational Rehabilitation procedures provide internal guidance for ACCES-VR staff only and create no procedural or substantive rights for any individual or group.

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Introduction

ACCES-VR's policy on consumer involvement is intended to support consumers in making informed and meaningful choices about their goals and options for achieving them, in a manner consistent with sound public policy and the use of public funds. The policy states that ACCES-VR will only support the most cost-effective option that leads to the individual's employment goal, in keeping with the person's needs.

Procedure

Referral and Intake

Agencies that refer people to ACCES-VR should be informed of ACCES-VR's policy on consumer involvement as part of the ongoing process of our education of referral sources. Referral sources need to know that while we appreciate any information they can provide about the person's interests and preferences, the determination of what services ACCES-VR will support can only be made as part of our counselor developing the IPE with the consumer. Referral sources should be made aware that ACCES-VR considers comparable benefits, economic need and cost-effectiveness when determining ACCES-VR support for services.

Orientation and Intake

Initial meetings with ACCES-VR staff should emphasize the importance of consumer involvement in the entire VR process, especially in the development and selection of

vocational goals and programs or sources that lead to those goals. Staff shall emphasize that ACCES-VR's role is to help people go to work and that the services we sponsor must relate to that outcome. The consumer may prefer a program that is more costly (due to basic program costs or the additional supports it may entail), but ACCES-VR's financial support will be limited to the most cost-effective option, that is, the least costly alternative that provides the supports and services essential for the person to achieve the agreed upon vocational goal. The most cost-effective program may not always be the least expensive; it could be a more expensive program with significantly better placement outcomes.

Another area to stress is that of transferable skills. People need to know from the outset that transferable skills, without retraining, may enable them to directly obtain employment through ACCES-VR's assistance. This would mean that ACCES-VR would offer direct job placement assistance rather than a training program.

IPE Development

The consumer's involvement is critically important in developing the goals and services reflected in the IPE. The counseling process is our most effective tool in helping consumers define and focus their interests and abilities in developing realistic employment goals. Consumers should be advised early in the process that ACCES-VR is not necessarily the sole source of support in achieving those goals, and that our agreement to a goal does not imply ACCES-VR financing of all related services. Economic need, comparable benefits, and cost-effectiveness may limit ACCES-VR's financial contribution in some instances, but by involving the consumer in the discussion of options and available resources throughout the counseling process, ACCES-VR can provide information on other sources of support, help consumers modify their goals as appropriate, and select cost-effective options.

Examples of cost-effective programs are as follows:

1. The consumer has a vocational goal that can be achieved through either a business and trade school or a community college. The community college program is less expensive and has a comparable or better placement record. If the consumer opts to attend the business school, ACCES-VR will limit its tuition support to the amount that would have been paid to attend the community college.
2. The consumer's training can be met equally well by two programs, one that includes needed support services and one that would require support services to be arranged separately at extra cost. If all other factors are approximately equal (see D), but if the consumer elects to attend the more costly program, ACCES-VR's financial support would be limited to the cost of the program that includes support services. In some cases it may be less costly to provide room, board, and transportation to an out-of-state program that provides support services such as interpreters rather than have someone attend a local program that has no support services.

Considerations for Comparing Cost-Effectiveness of Services

A number of factors must be considered in combination when comparing the cost-effectiveness of similar program options. Because ACCES-VR is a public agency responsible to the taxpayers as well as those individuals with disabilities it serves, cost is a primary consideration for determining ACCES-VR level of support. However, in some instances, other mitigating factors may make the least costly alternative not a cost-effective one because it does not compare favorably with another option in terms of success rates, appropriateness, or other important factors. Where a program is new and there is no data related to program outcomes, labor market information will be especially important in helping to define vocational and training objectives.

Counselors will use the following factors in determining with a consumer the most cost-effective service alternative that ACCES-VR will support. Where available, reports and quantifiable data will help in determining cost-effective options, but the knowledge and experience of counselors and other district office staff are of critical importance in decision making. Once this determination has been made, an individual may still choose a more expensive alternative, but the individual will be responsible for the additional costs of that choice him or herself, and the IPE should reflect this clearly.

Cost: The total cost to ACCES-VR of all components of the IPE must be compared for each option under consideration, including: the availability of comparable benefits, the availability of support services, expected family contribution under economic need, additional costs for transportation to and from the program versus room and board, etc. The actual costs to ACCES-VR for specific services should be determined for each alternative IPE.

Level of integration: The ability of the program to provide services and placement in the most integrated setting is another important factor. ACCES-VR will support services provided in the most integrated setting, leading to the most integrated outcomes, consistent with the individual's desire. Physical and programmatic accessibility of the program should also be considered.

Duration: Any added costs of choosing a longer program and any delay in reaching the employment goal must be considered. Also the availability of comparable benefits may be limited to specific durations by other funding sources (e.g. TAP) which, if exceeded, may add costs to ACCES-VR.

Effectiveness: Effectiveness indicators such as placement rates and completion rates of different programs must be considered in the cost-effective comparison. A more expensive program can be chosen if, proportionally, significantly fewer participants drop out and/or significantly more participants are placed in integrated employment in the occupation for which the training was provided. The experiences of other consumers should also be considered when comparing the quality of similar programs. For instance, if a number of consumers have complained about the instructional programs of a particular school, the next least costly alternative with higher consumer satisfaction

could be chosen. Other factors such as product reliability, repair rates, and extended warranties should also be considered when comparing the quality of services, if appropriate.

Timeliness: The relevance of equipment purchase or the ability of a program to deliver the service an individual needs for an immediate job placement must also be considered. However if a delay in obtaining the alternative service or equipment purchase would not jeopardize an immediate job opening, then timeliness cannot be used as a factor in determining cost-effectiveness.

Proximity: The proximity of a program to the individual's primary residence should be considered in terms of commutation costs as well as any continuing support from natural supports (family, significant others, friends, support groups, etc.) that would offset costs that ACCES-VR would otherwise incur.

Appropriateness of Service Options to Meet the Individual's Needs: The match between the selected service option and what is necessary for the individual to reach his or her employment goal is essential. For instance, a six month certificate program in word processing may lead an individual to the same employment goal more quickly and less expensively than a longer program with another training provider.

Waiver Process Overview

A Central Office Waiver Committee has been established to consider all waiver requests as submitted by Regional Coordinators, District Office Managers or their designees. The Waiver Committee is composed of representatives of the Operations Unit, Policy Unit and Quality Assurance Unit, and decides on the merits of each request through consensus of the members. In reaching its decision, the Waiver Committee will consider whether the request clearly documents the consumer requires the service to obtain employment and that no other resource is available to cover the cost. An example would be the availability of a comparable degree program at a public college or university as opposed to a higher cost degree program at an independent or proprietary college. Waivers are approved on a case-by-case basis.

Waiver requests should be submitted to the Waiver Committee in writing, by email or fax. Supporting documentation can be attached, or the committee can be directed to case notes in the consumer's electronic record of services.

Waiver Rule: Waivers must follow the waiver process and be submitted to the Central Office Waiver Committee. This includes, but is not limited to, non-degree business and trade schools, home modifications, on-the-job training, and vehicle modifications. For a complete list of services with a cap that may require a waiver see PRO-04-01.

Exception for College Waivers: Waivers for college related services (tuition, fees, books, room and board and transportation) within specified parameters can be approved by the Regional Coordinator, District Office Manager or designated supervisor

for approval, in accordance with 405.00P College and University Training Procedures, Section H (revised April 10, 2006).

College waiver requests that exceed the parameters established in Section H of 405.00P must be submitted to the Central Office Waiver Committee using the College Waiver Application Form. The committee will make the final determination. The deadline for college waivers is December 1 for fall semester and March 1 for spring semester.

General Process for Submitting Waivers to Central Office for Approval:

1. Record the justification for the waiver in the waiver header of a case note. Review with your supervisor then forward to the district office manager or designee for final review. Typically the IPE Development for Original IPE Case Note or the IPE Development for Changes Case Note will be used for recording the justification for the waiver. The waiver header can also be added to the Chronological Case History Case Note.
2. All waiver requests should be reviewed at the district office level prior to submission to the Central Office Waiver Committee. Additional documentation, if needed to support the waiver request, can be faxed to District Office Operational Supports at 518-473-6073.
3. All general waivers will be forwarded to the Assistant Commissioner for final review. The Waiver Committee provides communication of the waiver determination back to the district office.
4. If approved, the district office will finalize the IPE on CaMS. If not approved, the district office will work with the consumer to seek alternatives.
5. Authorization for approved waivers must reflect a starting date that is after the approval date.

Documentation

The options discussed by the consumer and counselor, including a comparison of the factors that were considered in determining cost-effectiveness and the reasons for selecting a particular option, should be documented in case notes. If the counselor and consumer cannot achieve consensus, the record should indicate the reasons for their respective opinions and that the consumer was advised of the appeals process.

Reference:

Policies:

- 105.00 Due Process
- 202.00 Eligibility of Services
- 204.00 Assessment
- 206.00 Individualized Plan for Employment
- 405.00 Training at a College or University

Procedures:

- 105.00 Due Process Procedures
- 202.00 Eligibility of Services Procedures
- 206.00 Individualized Plan for Employment
- 405.00 College and University Training Procedures
- 500.00 Case Record Procedure

Other:

- FIS-05-03 Restoration of Fully Funded Training Services

Obsolete:

- PRO-06-03 Waiver Process Overview