



**Department of Health and Human Services
Division of Employment and Independence
for People with Disabilities**

Policy Directives

VOCATIONAL REHABILITATION PROGRAM

Effective Date: October 1, 2011

Revision Date: March 14, 2025

Volume I Policy Directives

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NOTE: Directives marked OBSOLETE have been removed/relocated to a separate file on SharePoint

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#07-2020 – Background Checks

#08-2020 – Using Approved Videoconferencing Technologies to Provide Services Remotely *OBSOLETE*

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Year Issued: 2021

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Year Issued: 2022

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[#03-2022 - FNS Allowable Net Monthly Income Table](#) *OBSOLETE*

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[#05-2022 - ADVP Outreach Counseling for Competitive Integrated Employment Pathways](#) *OBSOLETE*

Year Issued: 2023

[#01-2023 - FNS Allowable Net Monthly Income Table](#) *OBSOLETE*

Year Issued: 2024

[#01-2024 - FNS Allowable Net Monthly Income Table](#) *OBSOLETE*

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Year Issued: 2025

[#01-2025 - Voter Registration](#)

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**North Carolina
Department of Health and Human Services
Division of Vocational Rehabilitation Services**

Michael F. Easley, Governor
Carmen Hooker Buell, Secretary

George McCoy, Director

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August 27, 2003

MEMORANDUM

To: All Staff Assigned Volume I

From: Georgia Steele, Assistant Director
Program Operations and Support Services

Re: **INTERIM POLICY AND PROCEDURE DIRECTIVE #1**

Please create a new tab in your Appendix for "Policy Directives" following appendix section "P" and file Interim Policy Directive #1 in the Appendix in the new section. This section will be utilized to file information previously sent out as informational memos from multiple sources. The Directives will be numbered differently in order to distinguish the directive from Policy Transmittals.

Policy Directive #1 addresses the recent changes in CATS and IMS edits to insure accurate reporting to RSA. This Policy Directive must be followed until a Policy Transmittal or another Policy Directive replaces the content of the directive.

Please address questions regarding the reporting issues to Marjorie Donaldson.



North Carolina
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POLICY and PROCEDURE DIRECTIVE MEMORANDUM # 1

TO: Regional Directors, Unit Managers, Quality Development Specialists,
Counselors

FROM: Marjorie Donaldson, Chief of Planning and Development

SUBJECT: Client Data Input and Data Maintenance Changes

DATE: August 27, 2003

As discussed at the August 6, 2003 Management Team meeting, there are several issues regarding the input and upkeep of client data that have to be addressed immediately in order to comply with RSA requirements and all federal reporting due to increasing and substantial errors.

Therefore, effective immediately, the following areas will be mandatory and edits will be in place to assure compliance:

Primary Support: Must be reported at application and updated at closure.

Public Support: Must be reported at application; reviewed at the time of eligibility; and updated at closure. The amount received by the individual each month for each source of public support must be recorded.

In addition, an edit will be in place to disallow public support amounts exceeding \$4,000. If there is a legitimate case where the amount exceeds \$4,000, please contact Jennifer Mitchell.

Medical Benefits: Must be reported at application and updated at closure. Each type requires a response either yes or no, and cannot be skipped.

Veteran Status: A response either yes or no is required. This field cannot be skipped.



Social Security Numbers: Input of the SSN has to be done before any type of case closure including “08’s (closure from applicant status).

IPE date and Closure date: There have been hundreds of cases over the past two years where the IPE date input was prior to the eligibility date. In addition, cases were closed with a date prior to the application date. An edit will be in place to prevent this from occurring.

Extended Employment: Closure reason 14 (extended employment) is only allowed for status 28 closures.

Significant Medical Improvement

Input of this information will no longer be required.

Backdating of Status 12

Recently, there has been a noticeable increase in requests to Jennifer Mitchell to backdate cases in status 12. The majority are cases where staff indicated that they failed to input a status change from status 10 to 12 in CATS or failed to do so at the time they developed an IPE. Requests recently from staff have been to backdate status 12 as far back as April of last year. Jennifer will assist staff with backdating status changes as long as it is within the current quarter and does not cross state or federal fiscal years.

As you are aware, the Division submits quarterly and annual federal reports to the Rehabilitation Services Administration (RSA) as required by the Rehabilitation Act and regulations. Much of the quarterly data reported is based on eligible clients with a plan for services. This information has to remain constant once reported. Therefore, please remind staff to check their masterlists more frequently to minimize the number of cases on a monthly basis that require backdating.

As noted previously, edits will be in place for both CATS and IMS to assure that this data is captured as indicated. Cats will bring forward on the closure screen the level of education, public support and medical benefits that were input at application. The counselor will be required to verify these and adjust any fields that are different at the time of closure in order to maintain correct data.

Required Verification Checks

RSA also conducts what it deems “reasonableness checks” of the data submitted. These areas are not necessarily errors **but do require verification**. Many of you have been asked to verify the accuracy of such data in the past. The major areas that fall under this category are:

- Verification of amounts of SSI, VA, other public support greater than \$4000.

- Verification of cases with closures of successful outcome and unsuccessful outcomes after services have been provided that have no cost.
- Verification of cases with costs greater than \$100,000.
- Verification of cases with time spent in VR less than three days.
- Verification of cases with age greater than 75 at time of application.
- Verification of cases with age less than 14 at time of application.
- Verification of cases in VR greater than 12 years.
- Verification of hourly wages greater than \$50/hour at application and /or closure.

Missing Data Report for Field Staff Use

Effective this month, a new report has been generated and is available on EXPORTER. It is labeled: VCMB970 RSA Data Miss.-Mo. located under DHR/VRA in EXPORTER. This report is available for each caseload. Security is set up so that a counselor can only look at his/her own caseload. Managers and QDS's will have access to their multiple caseloads. The purpose of this report is to provide a mechanism for counselors and office assistants to know what cases require corrective action and allow them to make those corrections. This report indicates both errors and data that need verification. Please have your staff move this new report (VCMB970) to their favorites list in EXPORTER.

Currently, there are approximately 10 pages of missing data per caseload on this report. This represents a number of older cases that have been closed during the federal fiscal year that will end next month. Therefore, it is very important that staff work now to correct the areas noted on their caseload's report before the end of September. Jennifer Mitchell will be available to assist staff with this process and she will, as you know, be the person who will need to confirm this data prior to reporting. Jennifer will start reconciling this data in October to be submitted for the RSA-911 report for federal fiscal year 2002-2003.

Items on this report that require verification, as noted above, will not drop off the counselor's report and will remain there each month. The counselor or office assistant will be required to send via email, a response to Jennifer confirming the action taken on these items (correction or verification of accuracy). Once this is sent to Jennifer, no further action should be necessary.

The **VCMB970 RSA Data Miss. Report** will be available monthly for on-going caseload maintenance. Once the large amount of data noted previously is corrected and/or provided on these older cases, subsequent monthly reports should be considerably smaller. A "tickler" reminder will be generated for each caseload counselor via CATS regarding the need to address errors/missing data.

The client data reports the Division submits to RSA is the primary basis by which the VR program is evaluated. When errors occur, the Division is required to correct it quickly. Therefore, it is critical that we all put forth strong effort to get it right initially.

Thank you for your attention to this matter. Please contact Jennifer Mitchell or me if you have any questions.



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Linda S. Harrington, Director

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MEMORANDUM

To: All Staff Assigned Volume I

From: Brenda S. Williamson, Assistant Director, Employment Services
Carol Potter, Assistant Director, Community Services

B.S. Williamson
C.P. Potter

Date: February 9, 2006

Re: **INTERIM POLICY AND PROCEDURE DIRECTIVE #01-2006
VR and IL Personal Assistant Services – SECTION 2-18**

The purpose of this directive is to bring the VR/IL Personal Assistance Services policy (SECTION 2-18) up to date with IRS requirements and to insure, to the extent possible, that our clients/participants are in compliance with the law so that they do not incur penalties for being delinquent in the payment of the FICA tax. Also, VR counselors are increasingly utilizing personal assistance services with clients, particularly in instances where the client is the actual employer of the personal assistant instead of securing this service through traditional home health agencies. In these cases, we are adding procedures to help insure that client's are fulfilling their responsibilities in paying the federal household employer (FICA) tax.

VR counselors must follow the IL Personal Assistance Services Policy (SECTION 2-18-1 Participant as Employer) when the client is the employer of the attendant. The Controller's Office will no longer process payment for VR personal assistance services unless the IL policy is followed in these situations.

This policy directive also addresses new procedures for client/participants in maintaining tax withholdings on their attendants when the client/participant is the employer of the personal assistant. Clients/participants are required to pay federal household employer (FICA) tax either quarterly or annually depending on their individual circumstances. The client/participant is responsible for determining what his/her obligation is for schedule of payment of FICA taxes, either with or without



assistance from an accountant or bookkeeper. There are numerous variables that must be taken into account in determining if the federal household employer tax (FICA) is to be paid either quarterly or annually. **It is not the role of the VR/IL State Agency to make these determinations for the client/participant.** If we were to attempt this and make incorrect determinations, the division would be liable for the payment of penalties.

The Division is no longer providing the FICA tax to the client/participant on a bi-weekly basis as it has in the past. Our policy heretofore has stated that "It is the responsibility of the participant to save the FICA taxes received and withhold until the end of each calendar year when those taxes are to be submitted to the IRS". In the future, these funds will not be released until they are needed for the quarterly or annual payment of FICA, whichever is applicable. Clients/Participants must determine their own individual schedule of payment of the FICA tax and document such on the new DVR Form 1022A, to be submitted to their rehabilitation counselor. For the current tax year 2006, clients/participants should submit this form to their counselors by March 1, 2006, so that the division can provide them the FICA money in time to pay their first quarterly tax payment (if applicable) for the current tax year 2006.

Revised Policy

Volume I, Section 2-18 - "Participant Employer-Related Tax Obligation", Number 3 (FICA Taxes), is revised to state that at the end of each pay period, the participant will be reimbursed for only the net wage based on form DVR-1019 "Record of Personal Assistant Hours" (timesheet) that the participant submitted to their counselor. The client/participant shall complete and return Form DVR-1022A and return it to their counselor by March 1 of each year or within twenty-one (21) days after actually hiring their first personal assistant(s). In the future, it is the responsibility of the participant to pay the FICA tax either quarterly or annually as they have determined on Form DVR-1022A. The client/participant shall pay the FICA tax as specified on the "Federal/State Household Employer Tax Payment Schedule" provided by the counselor. Within seven (7) days of paying the federal/state household employer tax, the client/participant will complete form DVR-1022B "Payment of Federal/State Household Employer Taxes" and return it to their counselor.

Due to the fact that the client/participant needs to complete and return form DVR-1022A to their counselor by March 1, 2006, it is necessary for staff to immediately provide the client/participant with copies of the following forms:

- Form DVR-1022A "Payment of Federal Household Employer Tax" is a new form. The participant will need to complete this form and return it to their counselor by March 1, 2006.
- Form DVR 1019A "Personal Assistance Services Receipt" has been revised to remove the language regarding the FICA amount being withheld in the checking account.
- Form DVR-1022B "Payment of Federal/State Household Employer Taxes" is a new form. The participant will need to complete this form and return it to



their counselor after paying their federal and state taxes.

- “2006 Federal/State Household Employer Tax Payment Schedule for Participant Use”
- “2006 Federal/State Household Employer Tax Payment Schedule For Staff Use Only”





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MEMORANDUM

To: All Staff Assigned Volume I

From: Elizabeth W. Bishop – Section Chief, Program Policy, Planning and Evaluation

A handwritten signature in blue ink that reads "Elizabeth W. Bishop".

Date: July 3, 2006

**Re: INTERIM POLICY AND PROCEDURE DIRECTIVE #02-2006
Self-Employment/Small Businesses with Supports for Individual's with the
Most Significant Disabilities**

In addition to adhering to existing policy in Volume I regarding **Small Business Operations (Section 2-23)**, Self-Employment/Small Business with Supports for individual's with the most significant disabilities (MSD) must meet the following additional criteria:

1. The individual must be eligible for services and must be able to perform, at a minimum, one primary function of the job goal for the entire work period in which the function is required with or without supports. This should be determined through a Supplemental Evaluation or other objective means.
2. The Business Plan must be developed by the client in partnership with the counselor. **It must then be approved by the unit manager and submitted to the Chief of Policy and Casework Operations for approval prior to planning, on the IPE, equipment and other services pertaining to the small business.**
3. The business plan must document all required supports needed and the source of long-term support must be included in the business plan which is submitted for approval.

4. Specific request for Supported Employment (SE) hours will not be approved as a part of the business plan. SE hours must be approved and authorized locally when issues arise that requires intensive training for the individual. SE hours will not be authorized for identified long-term support issues.
5. There may be occasions when the business plan is actually completed by other individuals or agencies acting on behalf of the client. In such instances, these should be objective individuals or entities who will not have a stake in or benefit from the proposed business (ie, local community college or university, financial institutions).

The business plan should be submitted for approval as early as possible in the VR process so as to minimize confusion and disappointment on the part of the client. Existing Volume I policies and procedures apply in the planning and ultimate provision of any and all services under consideration for this type of Self-Employment/Small Business project.





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MEMORANDUM

To: All Staff Assigned Volume I

From: Elizabeth W. Bishop - Section Chief, Program Policy, Planning and Evaluation

Date: July 3, 2006

**Re: INTERIM POLICY AND PROCEDURE DIRECTIVE #04-2006
Division Sponsored Drug Testing for Clients**

The Division may sponsor the cost of routine drug screening during the job placement phase of a case when it is required by employers to whom the individual is being considered for a referral for job placement. The client must be in agreement to undergo the drug screening.

Division sponsored drug screenings would be authorized and carried out prior to the individual being referred to employers to ensure that clients are drug free, job ready and an appropriate referral for the job opening. Should the individual refuse to undergo drug screening in situations where it is a legitimate concern for job readiness, Vocational Rehabilitation may suspend job search interventions on behalf of the client.

This screening service sponsored by Vocational Rehabilitation should not replace the official employer drug screenings that many employers carry out prior to hire but would be used as a pre-screening job referral intervention by Vocational Rehabilitation to insure the individual would meet the hiring requirements and is job ready.

Vocational Rehabilitation does not sponsor routine drug screening as a requirement for participation in Community Rehabilitation Programs or any other training program.

The Division may also sponsor periodic drug screenings on clients as part of a planned vocational evaluation, or as part of an IPE for the purpose of monitoring services addressing substance abuse/dependence interventions, treatment, and job-readiness when it is an issue related to substance abuse diagnoses. The client must be in agreement if these arrangements are made.

In that this service is considered diagnostic/assessment, it is not subject to the division's financial needs criteria.



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MEMORANDUM

To: All Staff Assigned Volume I

From: Elizabeth W. Bishop – Section Chief, Program Policy, Planning and Evaluation

Date: February 20, 2007

A handwritten signature in blue ink that reads "Elizabeth W. Bishop".

**Re: INTERIM POLICY AND PROCEDURE DIRECTIVE #01-2007
Workplace Violence**

The Division is committed to providing a safe and secure setting for employees to conduct their important work for the clients they serve. Likewise, we are also committed to providing a safe professional environment where client's can meet with vocational rehabilitation professionals to address their issues. We realize at times there can be situations in which applicants and clients become volatile or unstable to some degree. In many situations, this may be the focus of our vocational rehabilitation counseling in helping clients develop effective strategies in problem-solving difficult situations. However, clients are expected to follow societal codes of conduct and laws as set forth under our state and Federal statutes when conducting business and interacting with Division employees. The Division cannot tolerate behavior that is threatening, hostile, harassing, violent, intimidating, damaging to property, or physically aggressive to employees or others in the work environment, or when employees are in the community. Threatening behaviors could be made by phone, by mail, on site, after business hours, or in connection with other VR service providers such as Community Rehabilitation Programs (the respective policies of CRP would be applicable as well).

Definitions

- **Workplace Violence**: For purposes of casework and client services, workplace violence entails violence that may be carried out by consumers of services, their friends, relatives, strangers or acquaintances, and vendors either in an office setting or field location.

- *For issues involving staff against staff workplace violence, please refer to policies through the Office of State Personnel and Department of Health and Human Services.*

- **Threat**: The expression of intent to cause physical or mental harm. An expression constitutes a threat without regard to whether the party communicating the threat has the present ability to carry it out and without regard to whether the expression is contingent, conditional or future.
- **Intimidation** – Actions that include but are not limited to stalking or behavior intended to frighten, coerce, or induce duress
- **Harassment**: This is an unwanted persistent behavior against another person which results in physical or emotional intimidation.
- **Physical Attack**: Unwanted or hostile physical contact such as hitting, fighting, pushing, shoving, throwing objects, use of firearms or any weapons, or devices which would cause bodily harm.
- **Property Damage**: Intentional damage to property and includes property owned by the State employees, their consumers of services, visitors or vendors.
- **Improper Use of Internet/Telephone**: the use of various communication mediums to relay harassing statements or threats.

- **NOTE**: These guidelines do not apply to behaviors, statements, or actions which are inappropriate, offensive, irritating, or otherwise troublesome in nature. Such actions and behaviors are sometimes encountered by counseling professionals and other staff who work with people who have significant mental and/or physical disabilities. As professionals, we are expected to handle such actions and behaviors in a competent, efficient, and understanding manner. Supervisory and administrative consultation should be obtained whenever needed, but especially whenever it is felt that an action is becoming or constitutes a threat, violence, harm, harassment, or other form of intimidation. Unless an individual's action or behavior rises to the level of a threat, violence, harm, harassment, or other form of intimidation, it is expected to be treated, and responded to in a professional manner.

Each office must have emergency protocols for dealing with potentially dangerous or violent situations (this should be a type of alarm, warning system, or code words that will alert others to the fact that help is needed or that the police need to be called by someone other than the individual in the situation). If in an employee's judgment a situation requires immediate action, employees should attempt to utilize strategies of de-escalation. However, if an immediate danger exists, the police shall be contacted promptly. If a physical threat is taking place the threatened person should disengage from the threatening person involved as quickly as possible and obtain support from all other people in the vicinity. Consultation with supervisors and administration should be sought immediately. All other individuals in the vicinity should be informed that a threatening incident is occurring or has occurred. If someone is being physically attacked, and it is no longer a threat, that person has the right to defend himself or herself immediately, to escape or disengage from the situation, and to immediately seek all available assistance and support.



All threats, violence, harm, harassment, and other forms of intimidation must be documented using the *Workplace Violence Incident Report Form*. This form must be submitted to the most immediate and available supervisor, even when there is an uneventful or favorable resolution of the incident. Management, in consultation with Human Resources Staff and affected employee(s), will determine a measured response and course of action to take and initiate such, factoring in the perceived seriousness of the situation and need to involve others such as law enforcement.

When an individual demonstrates by past or present actions that they pose a threat to Division staff, they have forfeited the benefit to receive vocational rehabilitation services. The Chief of Policy and Casework Operations, or Section Chief for Policy, Planning & Evaluation should be consulted **in all such cases**.

1. If there is an open case, the case should be closed as “*failure to cooperate*”. The individual should be notified in writing of the closure, the reason for the closure (the individual’s behavior which was identified as violent or threatening), the State’s workplace violence policy, and the standard rights to appeal.
2. Requests to open new cases or reopen previously closed cases should be assessed very carefully. The individual must provide independent evidence that they have received services or therapy to address the previously identified violent or threatening behavior. It is the individual’s responsibility to provide such evidence. Independent sources for such evidence and evaluation may be a psychiatrist, psychologist, medical doctor, or other professional whom the counselor deems qualified to assess such situations. Participation in such services or therapy alone does not equate to eligibility for Vocational Rehabilitation services. The individual would still have to be determined eligible according to the standard eligibility policies and procedures. If a case is not opened or reopened, the individual should be notified in writing of the Division’s decision, the reason for the action, the State’s workplace violence policy, and the standard rights to appeal.

All VR Offices should have the weapon frees/prohibition policy posted.



WORKPLACE VIOLENCE INCIDENT REPORT – VOLUME I

Reporting Individual: _____

VR Work Unit: _____

Name of Intended Victim: _____

Date of Incident: _____

Specify Location of Incident: _____

TYPE OF INCIDENT: (Check one or more)

Threat:

- | | |
|--|---------------------------------|
| <input type="checkbox"/> Communicated directly to victim | <input type="checkbox"/> Verbal |
| <input type="checkbox"/> Communicated to another person | <input type="checkbox"/> Mail |
| <input type="checkbox"/> Other (Specify) _____ | <input type="checkbox"/> Note |
| _____ | <input type="checkbox"/> E-Mail |

Intimidation:

- Stalking
- Engaging in actions intended to frighten, coerce, or induce duress
- Other (Specify) _____

Physical Attack:

- Hitting, fighting, pushing, or shoving
- Use of object as weapon
- Use of weapon such as gun or knife
- Other (Specify) _____

Property Damage:

- Damage to State Property
- Damage to personal property
- Other (Specify) _____



North Carolina
Department of Health and Human Services
Division of Vocational Rehabilitation Services

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Carmen Hooker Odom, Secretary

Linda S. Harrington, Director

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Courier # 56-20-07

MEMORANDUM

To: All Staff Assigned Volume I

From: Elizabeth Bishop, Section Chief for Program Policy, Planning and Evaluation

Date: August 2, 2007

Re: **INTERIM POLICY AND PROCEDURE DIRECTIVE #06-2007**
Revised Tuition Rates for Postsecondary Training

A handwritten signature in cursive script that reads "Elizabeth W. Bishop".

The Division will sponsor the catalog rate for tuition and fees for clients attending institutions within the University of North Carolina System and NC Community College system. For each subsequent academic year, the Division will increase its rate to match the current UNC system or community college rate pending availability of resources. If the determination is made that sufficient resources are not available, the rate will remain the same as the previous year for each college/university. As always, comparable benefits must be applied when available.

For colleges and universities that are private or out-of-state, a new rate has been set that is commensurate with the maximum UNC system rate. Similarly, new rates are established for professional schools and proprietary schools.

Please refer to Volume V for the updated rates which are effective immediately.





North Carolina
Department of Health and Human Services
Division of Vocational Rehabilitation Services

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MEMORANDUM

To: All Staff Assigned Volume I

From: Elizabeth W. Bishop – Section Chief for Program Policy, Planning and Evaluation

Date: February 14, 2008

Re: **INTERIM POLICY AND PROCEDURE DIRECTIVE #02-2008**
Revisions to SECTION 2-14 MAINTENANCE Room and Board Rates for
Post-Secondary Training

Elizabeth W. Bishop

Division assistance with room and board, in support of post-secondary training, is subject to financial needs. For clients who meet the financial needs criteria and attend a school within the University of North Carolina System, the Division may sponsor the catalog rate for room and board. The Division will match the current UNC system rate for each subsequent academic year, pending availability of resources. If sufficient resources are not available, the sponsorship rate will not increase.

On-campus housing may be sponsored at the individual student's rate for a double occupancy room. The Division will sponsor the most cost effective double occupancy room that is air conditioned. However, if such an option is unavailable (i.e. the client has applied and been declined based upon lack of availability), the Division will sponsor the next most cost effective on-campus housing that meets the client's need (e.g. suites, university apartments). If suitable on-campus housing is unavailable and the only option for the client is off-campus, the Division will pay the maximum UNC system rate for housing (See Volume V, Post-Secondary Training for rates). A single occupancy room on campus may be authorized only if the Counselor determines there are disability related reasons that justify the need for such.

If it is the client's choice to live off-campus even though suitable on-campus housing is available, the Counselor may approve sponsorship at the Division's off-campus rate for the respective school (see Volume V, Post-Secondary Training), prorated for up to nine months per academic year.

Volume V – Post Secondary Training has a comprehensive listing of the meal plan and housing selections (with rates) for each of the schools within the UNC system. In some cases, multiple



options could be available (e.g. 14 meals per week, 10 meals per week). The counselor and client should determine which option best meets the client's needs. For clients who choose to live off-campus even though suitable on-campus housing is available, the Counselor may provide sponsorship at the Division's off-campus rate for the respective school (see Volume V, Post-Secondary Training) prorated for up to nine months per academic year. However, if suitable on-campus housing is unavailable and the only option for the client is off-campus, the Division will pay the maximum UNC system rate for board (see Volume V, Post-Secondary Training).

A new rate for room and board has been established for private, proprietary, and out-of-state colleges/universities. This new rate is commensurate with the maximum UNC system rate (see Volume V, Post-Secondary Training).

When available comparable benefits must be applied for any of these service options.

Note: Clients who meet the financial need test and are being assisted in post-secondary training under the old guidelines and maximum limits for maintenance, or are paying for their own room and board through student loans may be offered the opportunity to renegotiate their IPE's according to these new guidelines.





**North Carolina
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MEMORANDUM

To: All Staff Assigned Volume I

From: Elizabeth W. Bishop – Section Chief for Program Policy, Planning and Evaluation
Patricia “Trish” Harper – Accountant II

Date: August 12, 2008

Re: **INTERIM POLICY AND PROCEDURE DIRECTIVE #03-2008**
Instructions for Handling Invoices for Postsecondary Training Tuition and Fees
within the UNC System

A handwritten signature in blue ink that reads "Elizabeth W. Bishop".

On August 2, 2007, the Division revised policy to allow payment of tuition and fees at the catalog rate for clients attending institutions within the University of North Carolina System and NC Community College System. In order to carry out this revision in policy, there are some requirements, beyond our control, within the UNC system of tuition rate setting that we must accommodate and conform to in terms of our authorization and billing process. The UNC System Board of Governors reviews their schedule of tuition and fee rates on an annual basis for potential rate increases. This review takes place in October of each year. Increases are typically made to the rates which are immediate and retroactive to the beginning of the fall semester that is underway. Unfortunately, this puts Counselors in a position of issuing authorizations at the beginning of the school year using published tuition rates that will become outdated by the time invoices arrive.

In order for us to accommodate the UNC schedule of rate setting, and reconcile invoice and authorization amounts, we have put the following steps in place:

1. Issue authorizations for tuition and fees prior to the college year using rates published in Volume V
2. When the invoice is received from the university, check the amount invoiced against the authorization amount for tuition and fees. If there is an increase, check to determine if the increase is due to an actual UNC system increase in tuition rate and not to the addition of fees and services not covered by the Division. If there is no increase reflected on the invoice, cross reference the financial aid package to assure that the university has billed for the maximum amount possible while utilizing necessary comparable benefits. The student should not be left with a balance for tuition and allowable fees.

3. If the university has failed to invoice the Division for the maximum amount allowable to the student after comparable benefits have been applied, then a new invoice should be requested from the university which reflects the correct amount.
4. If there is a legitimate rate increase on tuition, go into CATS, authorization screen, and increase the amount on the authorization. Then, print out the revised authorization (R-2) to attach to the bill. Make sure the new amount is correct on the Case Service Invoice.
5. Submit invoice for payment.

Please note that this process does not require the counselor/Unit Manager to approve any overpay. It is anticipated that training invoices will be submitted at a higher than authorized rate.

If you have any questions concerning this policy directive, please contact Mac Britt at mac.britt@ncmail.net or phone # 919-855-3557.

If your questions involve rates, please contact Trish Harper at trish.harper@ncmail.net or phone # 919-855-3592.





**North Carolina Department of Health and Human Services
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MEMORANDUM

To: All Staff Assigned Volume I

From: Elizabeth W. Bishop – Section Chief for Program Policy, Planning and Evaluation

Date: March 15, 2010

Re: **Interim Policy and Procedure Directive #01-2010
ARRA Funded Policy Revisions**

A handwritten signature in cursive script that reads "Elizabeth W. Bishop".

As a part of the *Plan for Utilization of American Recovery and Reinvestment Act (ARRA) Funding*, the Division is temporarily revising several sections of Volume I. The revisions outlined in this directive, in conjunction with those temporary policies released in *Interim Policy and Procedure Directive #02-2010*, are intended to build infrastructure and stimulate local economies by enabling the community rehabilitation programs to support clients in job placement in on-the-job training situations. No ARRA Funds will be designated in this temporary policy directive; however the changes are intended to support and encourage OJT placements and the subsequent use of ARRA funds towards the reimbursement of client wages.

The following sections shall be cross-referenced as the policies in this directive supplement these sections:

Section 2-24-9 On-the-Job Training
Section 8-4-2, Outcome-Based Payment System
Section 2-24-11 Work Adjustment Job Coaching
Appendix Entry-PUR: Instructions for Program Utilization Report
Interim Policy and Procedure Directive #02-2010, ARRA Funded Policy Revisions
Form: *Work Adjustment Job Coach Timesheet, Rev. 3-2010 (VR Intranet, Forms)*

On-the-Job Training Coordination by a CRP

For clients who otherwise require work adjustment services by the community rehabilitation program (i.e., work adjustment training, job development, work adjustment job coaching), the Counselor may utilize the community rehabilitation program to also coordinate the OJT. For clients who do not require services by the CRP, the VR staff person shall carry out the procedures outlined in Section 2-24-9 along with the revisions in Directive #02-2009. The CRP may assist with the coordination of

OJT at the summation of work adjustment training or as a part of work adjustment job coaching if work adjustment training is not required. Work adjustment job coaching by CRP staff and OJT by the workplace trainer may be mutually suitable when:

(1) the client will benefit from the natural supports formed through an extended training relationship with the work trainer beyond that which constitutes a standard employee orientation;

OR

(2) the individual requires extended time to acquire information about the job or job tasks that is best trained by the direct supervisor;

AND

(3) the individual ALSO requires job coaching supports in order to promote skills not addressed by the workplace trainer's training plan. These skills may include the development of natural supports, development of self-advocacy skills on the job, incorporating self-care skills while in the workplace, or identifying and exhibiting "soft" skills necessary for successful job performance (e.g., punctuality, organization, appropriate interpersonal behavior, or recognizing workplace hierarchies).

When utilizing the assistance of a CRP to coordinate the OJT experience, the Division is responsible for the following:

- (1) Assuring that OJT is required in order to complete the IPE;
- (2) Adhering to the *restrictions* outlined in Section 2-24-9;
- (3) Selecting a CRP that can provide seamless services with respect to the OJT coordination and the job coaching, if required;
- (4) Providing referral information to the CRP including the client's projected length of training, a description of any anticipated training needs, and a request for the corresponding job coaching needs to accompany the OJT experience;
- (5) Reviewing the *OJT Vendor Review-On Site*, Form *DVR-0301*;
- (6) Reviewing and signing off on the *OJT Agreement and Progress Report*, Form *DVR-7008*, the *OJT Payment Agreement*, Form *DVR-7010*, and the *OJT Timesheet*, Form *DVR-7014* developed by the client, employer, and CRP; AND
- (7) Participating in progress review meetings and reviewing and signing off on the client's *OJT Agreement and Progress Report*, Form *DVR-7008* to monitor and determine the client's overall adjustment to the job and the point of completion of the OJT.

The CRP is responsible for the following:

- (1) Performing job development/job placement activities as requested by the Counselor and marketing the OJT reimbursement assistance available by the Division;
- (2) Upon job offer, meeting with the workplace trainer and client to determine the training priorities to be included on the training agreement;
- (3) Identifying and distinguishing, in conjunction with the client and employer and with approval from the Counselor, the skills that will be trained by the workplace supervisor versus the skills that will be trained by the CRP staff, if applicable;
- (4) Providing the *OJT Vendor Review-On Site*, Form *DVR-0301*, the *OJT Agreement and Progress Report*, Form *DVR-7008*, the *OJT Payment Agreement*, Form *DVR-7010*, and the *OJT Timesheet*, Form *DVR-7014* to the client and employer for approval;
- (5) Submitting the completed OJT paperwork to the Counselor for approval; AND
- (6) Arranging and participating in training progress review meetings with the client, employer, and Counselor to review the client's training progress.

The OJT training period may occur concurrent with the work adjustment job coaching period, however the CRP's role in both job coaching and OJT coordination must be clearly documented on the work

adjustment plan. Time spent in various activities listed on the work adjustment plan shall not be duplicative. *In addition, although the CRP staff may coach the client and coordinate the client's OJT, the CRP is **not permitted to both coordinate and provide OJT** should the client be competitively employed under the CRP's operations.* The Counselor, client, employer, and CRP staff shall jointly determine when the client has achieved the training goals established in the On-the-Job Training Agreement.

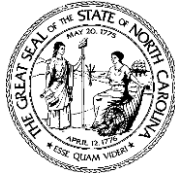
Authorization and Billing of OJT Coordination by a CRP

OJT Coordination by Performance-Based CRPs

Performance-based community rehabilitation programs may provide OJT coordination as a part of work adjustment services. Any time spent doing OJT coordination, according to the work adjustment plan agreed upon by the Counselor, is incorporated into the Counselor's authorization for work adjustment training and/or work adjustment job coaching. The community rehabilitation program staff shall record hours spent on OJT coordination in the PUR system as either *job development/job placement* or *training*. The Counselor may award the CRP with a payable major benefit code of *03, Left Program for On-the-Job Training* when (1) all job coaching has ended, (2) the CRP has provided job development/job placement resulting in an OJT, (3) the CRP has facilitated completion of the OJT vendor review, *OJT Agreement and Progress Report*, and *OJT Payment Agreement* forms, and (3) the CRP has provided follow-up of the OJT for a minimum of 30 days past the date of job placement. The 90 day count for successful employment may not be initiated until the client has completed the OJT.

Coordination by Individual Authorization CRPs

Individual authorization community rehabilitation programs may provide OJT coordination in conjunction with other work adjustment services as directed by the Counselor. OJT Coordination will be included as a separate service definition on the work adjustment intervention timesheet. OJT coordination may be billed for time spent educating the employer on the OJT service, time spent providing the necessary paperwork to set them up as an OJT vendor, time spent developing the *OJT Agreement and Progress Report* and *OJT Payment Agreement* with the client and employer, and time spent meeting with the client and employer to discuss the client's progress in the training plan. Time spent in OJT coordination will be recorded on the revised *Work Adjustment Job Coach Timesheet* as *OJT Coordination*. **There shall be no duplication of services.** The CRP shall only bill for one type of intervention during a specific time period. OJT Coordination shall be billed on an authorization for either job development/job placement or job coaching hours.



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MEMORANDUM

To: All Staff Assigned Volume I
From: Neil Mac Britt – Chief of Policy *Neil Mac Britt*
Date: September 14, 2012
Re: **Interim Policy and Procedure Directive #03-2012
Instructions for Handling Milestone Job Development Payments for
Authorization Payment CRP Programs**

Introduction:

Effective October 1, 2012 we are implementing a milestone payment system for supported employment and work adjustment job coaching services for those CRP's currently under an hourly rate. The milestone payment will only be applied to the job development (JD) phase for supported employment (SE) and work adjustment job coaching (WAJC). All other phases of these services will remain under the current hourly rate of payment.

The agency will be working with our CRP Steering Committee and other stake holders to develop full implementation of a milestone system of payment for all phases of WAJC and SE for authorization programs by July 1, 2013.

This new payment system will allow us to move services in a direction that establishes accountability and less paperwork for CRP and VR staff. This will also allow focus on positive outcomes for our consumers vs. the process and activities that lead to outcomes.

Authorization payment system CRP programs will be able to continue hourly rate billing for supplemental evaluations, intensive training and work adjustment training through July 1, 2013.



Supported Employment Cases
(Carried over after Oct 1st 2012):

Current cases carried over into milestone payment system (beginning Oct 1st 2012):

- Tier 1:** If total payments < \$2,000 at the time of placement then the milestone payment will be made for the difference between the sum amount paid and \$2,000, with an additional closure payment of \$750 for status-26.
- Tier 2:** If the total payments are between \$2,000 and \$2,500 at the time of placement then the milestone payment will be made for the difference between the sum amount paid and \$2,500, with an additional closure payment of \$250 for status-26.
- Tier 3:** If the total payments at time of placement are between \$2,500 and \$2,750 then the milestone payment will be made for the difference between the sum amount paid and \$2,750, with no additional closure payment will be made for status-26.
- Tier 4:** If the total payments > \$2,750 at the time of placement then the milestone payment will be made for the \$250, with manager approval, and no additional closure payment will be made for status-26.

For the current CRP, authorization numbers for JD effective prior to 10/1/12 must be listed on the milestone invoice form and sent to the State Office to process for payment.

**Milestone Chart for Supported Employment:
 New Cases Served Beginning Oct 1, 2012**

Tier	JD Milestone Payment	Additional Status-26 Payment	New Cases After Oct 1
1	\$2,000	\$750	1 st Placement
2	\$500	\$250	2 nd Placement
3	\$250	\$0	3 rd Placement
4	\$250	\$0	4 th Placement*

***Any placements beyond the 3rd require unit manager approval and will be paid at the rate of \$250.**

Work Adjustment Job Coaching Cases **(Carried over after Oct. 1st 2012)**

Current cases carried over into milestone payment system (beginning Oct 1st 2012):

- Tier 1:** If the total payment amount is less than \$2,000, then the milestone payment will be made for the difference up to \$2,000.
- Tier 2:** If the total payment amount is greater than \$2,000 but less than \$2,500, then the milestone payment will be made for the difference up to \$2,500.
- Tier 3:** If the total payment amount is greater than \$2,500 but less than \$2,750, then the milestone payment will be made for the difference up to \$2,750.
- Tier 4:** If the total payment amount exceeds \$2,750, a milestone payment of \$250 may be made with unit manager approval

For the current CRP, authorization numbers for JD effective prior to 10/1/12 must be listed on the milestone invoice form and copies of intervention timesheets sent to the State Office to process for payment.

- The total JD and training hours should not exceed 160 hours total according to policy. If additional training hours are required, the unit manager must approve.
 - 1st placement
 - \$2,000.00 equals approx. 58.25 hours of JD time
 - 101.75 hours remain for training
 - 2nd placement
 - \$500.00 equals approx. 14.50 hours of JD time
 - 87.25 hours remain for training
 - 3rd placement
 - \$250.00 equals approx. 7.25 hours of JD time
 - 80 hours remain for training

***Unused training hours will not be applied to training provided as part of a second or third placement**

Procedures

The following procedures should be utilized to authorize job development under the milestone payment system for authorization based programs:

1. An authorization, Case Service Invoice (CSI) and Milestone Payment Request form must be prepared for each tier of job development and milestone requested from the current CRP. This is the agency required evidence that the counselor and CRP have agreed to the purchase of this service and payment for milestone achievement. All milestone payment must have the above mentioned documents included to be processed for payment to include 26 closure payments.
2. The Case Service Invoice should be completed by the vendor and VR counselor for each authorization issued to the CRP for the current vendor. Fiscal Services will fill the amount in once the calculations are done and adjust the authorization amount accordingly

3. Staff should make sure the RCC code on the authorization is 2C05 for any Work Adjustment services and one of the statewide 1300 series codes for Supported Employment.
4. The authorization amount should be \$1.00 with a description that states the following as applies:
 - **Job development under milestone payment system after placement and 3 days of employment or**
 - **Job development for placement #1, #2, #3 #4 after 3days of employment (indicate: SE or WAJC)**
 - **26 closure payment for placement #1,#2,#3,#4**
5. CRP's should be issued an agency developed milestone payment request form to be completed by the vendor and signed off on by the counselor verifying the placement and 3 days on the job.
6. The milestone payment request form must have current and any historical authorization number(s) for current vendor as appropriate for cases carried over prior to 10-1-12.
7. Milestone payment request form(s) for job development (JD) under work adjustment Job coaching (WAJC) must have copies of intervention time sheets to coincide with authorization number(s) for current vendor services prior to 10-1-12.
8. The milestone payment request form must have current and any historical authorization number(s) for current vendor as appropriate for cases carried over prior to 10-1-12.
9. Supplemental Evaluations are limited to no more than **25 hours** as approved by counselor and must address questions as prepared by the counselor.
Exceptions must be approved by Unit Manager
10. All cases carried over to the new milestone payment system must be issued new authorizations, case service invoices and milestone payment request forms. No billing can be accepted which reflect hourly services provided after **October 1st 2012**.

All billing for services prior to October 1st 2012 should be processed as quickly as possible in order for fiscal to appropriately determine the milestone payment for carry over cases. Milestone payment request will not be processed by fiscal until previous authorizations and hourly services are completely reconciled as verified through VR case management system.

If you have questions involving rates, please contact Trish Harper via email at trish.harper@dhhs.nc.gov or by phone (919) 855-3592; TDD (919) 855-3579; Fax (919) 733-7968

For any billing questions, please contact Tina Grad via email at tina.grad@dhhs.nc.gov or by phone (919) 855-3595.

Supported Employment Job Development

Milestone Payment Request Form

VENDOR INFORMATION (Name): _____

VR Client Name _____ VR# _____

Current DVRS Authorization Number _____

Historical DVRS Authorization Numbers _____
(This includes any authorizations for JD services with current vendor prior to 10/1/12)

Date Client Accepted in Program _____

Job Placement

Placement Occurrence 1st 2nd 3rd 4th (Requires UM Approval)

Competitive Employment employer name, address, and phone number

Date Competitive Employment Began _____

3 Dates of Consecutive Employment _____

26 Payment Request

Stabilization beginning and ending dates _____

90 Days of Competitive Employment Begin and end dates _____

Vendor Signature _____ Date _____

Counselor Approval _____ Date _____
(Signature is confirmation that client employment has been verified)

Unit Manager Approval _____ Date _____

State Office Approval _____ Date _____

Original: State Office—Fiscal Services
cc: Client Folder

Work Adjustment Job Development

Milestone Payment Request Form

VENDOR INFORMATION (Name): _____

VR Client Name _____ VR# _____

Current DVRS Authorization Number _____

Historical DVRS Authorization Numbers _____
(This includes any authorizations for JD services with current vendor prior to 10/1/12)
Please include all intervention timesheets with this milestone payment request

Date Client Accepted in Program _____

Milestone Reached Job Placement

Placement Occurrence 1st 2nd 3rd 4th (Requires UM Approval)

Competitive Employment employer name, address, and phone number:

Date Competitive Employment Began _____

3 Dates of Consecutive Employment _____

Vendor Signature _____ Date _____

Counselor Approval _____ Date _____
(Signature is confirmation that client employment has been verified)

Unit Manager Approval _____ Date _____
(4th Placement and exceptions)

State Office Approval _____ Date _____

Original: State Office—Fiscal Services
cc: Client Folder



North Carolina Department of Health and Human Services
Division of Vocational Rehabilitation Services

Pat McCrory
Governor

Aldona Z. Wos, M.D.
Ambassador (Ret.)
Secretary DHHS

Linda S. Harrington
Division Director

MEMORANDUM

To: All Staff Assigned Volume I
From: Neil Mac Britt – Chief of Policy *Neil Mac Britt*
Date: February 25, 2013
Re: Interim Policy and Procedure Directive #01-2013:
Staff Use of Social Media

The purpose of this Directive is to address the use of Social Media and Social Networking Sites by Division staff, specifically communications with active consumers of the Division. This Directive was developed in accordance with the broader DHHS Policy on Social Networking/ Social Media Sites and with the Division's policy on Confidentiality of Client Information (Volume I and VIII).

This Directive is effective immediately.

- Employees are allowed to have personal social networking sites or interactive websites not maintained or located on a state-operated server. These sites must remain personal in nature and be used to share personal opinions and non-work related information. This helps ensure a distinction between personal and agency views. Employees must be certain that communications on any personal social networking sites do not interfere with their work during normal business hours. This excludes personal LinkedIn or similar networking tools for purposes of outreach to potential employers of the Division's consumers for purposes of basic contact not involving personal views or consumer-specific information.
- **Employees shall not use their personal social networking accounts to contact or communicate with consumers they are currently serving.** For situations in which staff have already made contacts with clients (or vice versa) on Facebook, twitter, MySpace, Google+ or others, these contacts shall cease with a brief communication by staff to the individuals explaining the termination. On Facebook this would involve "unfriending" or on Twitter "unfollowing".
- No confidential Division information shall be posted on any social media site.
- Employees should never use their state email account or password in conjunction with a personal social networking site.



- Email communications with consumers of the Division must be secure and confidential and generally must occur over state-operated servers and email networks.
- At this time, no Division unit office, section, region or staff member shall have any social media, or social networking site representing the Division.
- Division staff may utilize social networking sites to locate consumers by accessing the consumer's public Facebook or social network page to determine if contact information is available, much the same way a person would use a telephone directory to locate someone. However, staff must not attempt to contact consumers on Facebook. Social media access and use involving State equipment and resources are subject to the DHHS Computer Usage Policy at all times.
- DHHS has one official YouTube channel. No other YouTube channels are authorized. All work-related submissions for this channel must be approved by the DHHS Office of Public Affairs before posting and only after receiving approval through existing NC DVRS review and publication procedures.
- Personal views made and posted on YouTube shall not contain professional and agency views or information.
- Failure to observe and abide by this Directive may result in disciplinary action which may include dismissal.



North Carolina Department of Health and Human Services
Division of Vocational Rehabilitation Services

Pat McCrory
Governor

Aldona Z. Wos, M.D.
Ambassador (Ret.)
Secretary DHHS

MEMORANDUM

To: All Staff Assigned Volume I
From: Neil Mac Britt – Chief of Policy *Neil Mac Britt*
Date: **June 17, 2013**
Re: **Interim Policy and Procedure Directive #02-2013:
1281 Budget Suspension**

Effective July 1, 2013 the 1281 budget will be suspended indefinitely. This directive provides clarification regarding procedures for handling 1281 authorizations currently in effect in concurrent IL/VR cases through July 1, 2013.

Effective immediately, no further services should be authorized using the 1281 budget. Services required for a primary vocational purpose should be authorized using VR funds (following VR policy). Likewise services required for a primary independent living purpose should be authorized using IL funds (following IL policy).

IL counselors in particular should be aware that they can no longer plan or provide services subject to financial need using VR financial criteria/policy to sponsor IL services (subject to financial need) with a primary independent living purpose. IL financial need must be established to provide services from IL funds.

All 1281 budget authorizations in current cases that are not expected to be paid by the last check write of the 2012-2013 state fiscal year (projected to be June 24, 2013) must be deleted and authorized using either the VR or IL counselor's case service budget – depending on whether the service is for VR or IL purposes as described above.

Current cases with outstanding authorizations in which the client does not meet the IL needs test (VR financial status used) but require an IL authorized service should be authorized by IL with documentation on a Progress Review explaining that these services were previously approved through utilization of the 1281 budget and will be honored by the IL program. No additional services subject to financial need should be authorized by IL unless the client meets the IL financial needs test.

NOTE – SPECIAL CIRCUMSTANCES PERTAINING TO PERSONAL ASSISTANCE SERVICES (PAS):

PAS currently authorized using the 1281 budget will remain in place and paid out of 1281 as currently authorized through the last GT Payroll Period of the current SFY which is June 16 – June 29. A new authorization for payroll period of June 30, 2013 – December 31, 2013 will be issued out of the regular VR case service budget until other funding sources are identified and/or the case can be served by IL for PAS.





North Carolina Department of Health and Human Services
Division of Vocational Rehabilitation Services

Pat McCrory
Governor

Aldona Z. Wos, M.D.
Ambassador (Ret.)
Secretary DHHS

MEMORANDUM

To: All Staff Assigned Volume I
From: Neil Mac Britt – Chief of Policy *Neil Mac Britt*
Date: July 1, 2013
Re: **Interim Policy and Procedure Directive #03-2013:
Discontinuation of Division Contributions Towards Vehicles for Clients**
(Section 2-22-1: Purchases; Section 2-18-2: Vehicle Modifications)

Effective immediately, the Division will no longer financially assist towards purchasing - leasing the base vehicle (chassis*) for purposes of modifications for clients considered Most Significantly Disabled (MSD). The Division will continue to assist with the costs for required adaptive modifications of client/family owned or client/family leased to purchase vehicles subject to the client meeting the financial needs test. In vehicle modification projects, if the client does not already own a vehicle that can be suitably modified, the client will need to fully fund the base vehicle (chassis) portion of the project. Some vehicle modifications will require the purchase of a vehicle with the factory installed dropped floor conversion as part of the required modifications. The Division can fund the factory installed dropped floor conversion portion of the vehicle purchase as part of the modification package. The client must present evidence (receipt of transaction) of their payment of the full cost towards the base vehicle chassis before the Division can fund the dropped floor conversion.

This directive does not affect vehicle purchases that have already been approved by the Chief of Policy prior to July 1st. However, those that have not been approved will need to go back to the Counselor for a determination of whether the client can cover the full cost of the base vehicle chassis before proceeding further with the process.

*definition of chassis – the base unmodified vehicle





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Claudia B. Horn, M.S.
Senior Director

Elizabeth W. Bishop
Division Director

MEMORANDUM

To: All Staff Assigned Volume I
From: Neil Mac Britt – Chief of Policy *Neil Mac Britt*
Date: April 1, 2015
Re: Interim Policy and Procedure Directive #02-2015:
Changes to Paper-Based Financial Needs Survey (FNS) and
Completion of the Electronic FNS

Due to revisions to the 1040 tax form by the IRS and changes to North Carolina income tax withholding percentages the paper version of the Financial Needs Survey worksheet, accessible via the agency intranet, has been updated.

Changes are limited to the tax worksheet portion of the form and include:

1. Change in the 1040 line used to determine gross federal tax withheld. This information was found on Line 61 of previous versions of the 1040. It is now appears on Line 63.
2. North Carolina income tax withholding was reduced from 7% to 5.8%. (Please see usage note below).

DVR has requested that Libera update the electronic version of the form in BEAM to reflect these changes. Until that development has been completed users should take the following action:

1. Enter information from Line 63 of the 1040 form despite BEAM's instructions to use Line 61



LINE 1 (Net Wages)

Calculate monthly net income using the 1040

Form 1040, line 7 (gross wages)

Form 1040, line 61 (gross federal tax w/h)

Calculate the state w/h tax (if return is not available) (use a rate of 7% of line 7)

Net annual wage income

divide by 12 (months)

Net monthly wages (calculated)

2. The state withholding calculation in BEAM is automated and users cannot edit the result. Until such time as Libera makes this correction continue to use the amount calculated at the old 7% rate. Please note this will NOT have a negative impact on the client's determination of financial need as the erroneous calculation resulting from use of the higher rate acts in favor of the client.

LINE 1 (Net Wages)

Calculate monthly net income using the 1040

Form 1040, line 7 (gross wages)

Form 1040, line 61 (gross federal tax w/h)

Calculate the state w/h tax (if return is not available) (use a rate of 7% of line 7)

Net annual wage income

divide by 12 (months)

Net monthly wages (calculated)

Usage Note: To avoid a discrepancy between the calculated result on the paper form and the calculated result in BEAM for NC withholding, users should continue to use the 7% when making the calculation until such time as the electronic form edits are complete.



North Carolina Department of Health and Human Services
Division of Vocational Rehabilitation Services

Pat McCrory
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Elizabeth W. Bishop
Division Director

MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: August 21, 2015
Re: **Interim Policy and Procedure Directive #05-2015: Policy Transition Plan – In-School Work Adjustment (ISWA)**

Effective September 1, 2015

Procedures for dealing with students currently receiving ISWA are identified in this time limited transition plan. See attached for details.



Policy Transition Plan - ISWA

Revised In-School Work Adjustment (ISWA) policy will go into effect on **9/1/2015**. The policy changes will have impacts on clients currently receiving the service as well as schools/school systems who currently have ISWA agreements with DVRS. Below is a summary of the major changes and how we will transition from the prior policies to the new policies.

Summary of Change: All schools/school systems will need to sign new ISWA agreements to replace the existing agreements. Revising the ISWA agreement to be consistent with our policies and practice is a requirement of the corrective action plan from VR's 2014 State Audit. According to the corrective action plan, system agreements should be signed and effective by 10/15/15 in order to continue ISWA for a particular school.

Plan for Transitioning to the New Policy: Revised ISWA system agreements will be finalized and distributed to schools/school districts beginning 9/1/15. VR revised policy will be available and updated online. UMs will have been trained on the new policy in order to address/escalate concerns from schools in signing agreements.

Summary of Change: School personnel need to be trained on new policy and procedures.

Plan for Transitioning to the New Policy: While the system agreements are being circulated for signature, VR Counselors should begin training relevant school personnel on the revised policies/procedures contained in the system agreement and VR Volume I. VR Transition Counselors will be provided with training materials (PowerPoint and sample forms) to aid in explaining the service and to promote consistent messaging to school personnel. Once school staff have been trained and the revised agreement has been signed, then school/VR staff will be positioned to provide the service according to the new policies.

Summary of Change: Students who have never received ISWA but who require it under the new policies will need to initiate the service according to the new policies.

Plan for Transitioning to the New Policy: VR Counselors should not initiate ISWA for new students (those students for whom ISWA is appropriate under the new policies, but who have never received ISWA services before) UNTIL THE REVISED SYSTEM AGREEMENT FOR THE CLIENT'S SCHOOL HAS BEEN FULLY SIGNED. VR Counselors should notify school personnel of this service pause for new students.

Once the revised agreement has been signed for the client's school, then the VR Counselor may proceed with planning/providing the ISWA to the student according to the revised policies. It is advised that the VR Counselor hold a Service Initiation Meeting with students who are new to ISWA that includes the student, the VR Counselor, school personnel, and parent/guardian (if applicable and wherever possible). Appropriate consent should be obtained prior to this meeting. During this meeting, the team can review the student's pre-assessment and complete the ISWA Student Agreement form to assure that all parties have a good understanding of the service. Once ISWA has been determined appropriate for the student, it should be added to the student's IPE.

Summary of Change: Students who were receiving ISWA in the spring of 2015 under the old policies will need to be transitioned to procedures and practices under the new policies.

Plan for Transitioning to the New Policy: For students who are in the middle of receiving ISWA services and who, under the new policies

- have an IPE
- require ISWA as an *adjustment* service
- have not yet exhausted 9 months of ISWA
- have not yet become competitively employed

- have an IEP
- are classified as SD or MSD
- are engaged in ISWA activities that are consistent with the student's IPE,

the VR Counselor shall continue ISWA stipends per the old policy and system agreements UNTIL THE REVISED SYSTEM AGREEMENT FOR THE CLIENT'S SCHOOL HAS BEEN FULLY SIGNED.

Once the revised system agreement has been fully signed, the VR counselor shall meet with each student for a Service Continuation Meeting. During this meeting, a new *Monthly In-School Work Adjustment Student Evaluation Form* shall be completed in order to determine the target areas for that student for the remainder of the ISWA time period and to re-establish a monetary incentive amount for that student based on the student's progress so far and the remaining goals to be achieved.

- If the evaluation indicates that the student no longer requires ISWA (no identifiable target goals) and there is no prior written commitment as to a specific length of the service, then the VR Counselor should end the ISWA service on the IPE with one month's notice.
- If the evaluation indicates that the student still requires ISWA services according to the new policy criteria, except that the student has already completed 9 months of ISWA AND VR has previously committed in writing to providing more than 9 months of ISWA, the VR Counselor shall review and complete the *In-School Work Adjustment Student Agreement* form with the student, parent (if applicable), and school personnel and indicate a training period that when added to the number of months already completed by the client, equals the amount of time previously agreed upon in writing.
- If the evaluation indicates that the student still requires ISWA services according to the new policy criteria, VR has not previously committed to more than 9 months of ISWA for the student, and the student has not yet exceeded 9 months, then the VR Counselor shall review and complete the *In-School Work Adjustment Student Agreement* form with the student, parent (if applicable), and school personnel and indicate a training period that, when added to the number of months already completed by the client, does not exceed 9 months. The student agreement form outlines the new policies and seeks agreement from the student, school personnel, and parent/guardian (if applicable) to continue to receive ISWA under the new policies. VR Counselors should take time to explain the impact of the new policies on the monetary incentive amount (the amount may be adjusted based on student performance). Students may opt out of ISWA if they do not wish to participate under the new policies. In this situation, the ISWA service should be ended on the IPE. Other VR services should continue according to the client's IPE.

For students who will continue to participate in ISWA, the monetary stipend amounts will be adjusted to correspond with the student's score on the *Monthly ISWA Student Evaluation Form*.

Summary of Change: Some school districts/schools may elect to discontinue ISWA system agreement with VR.

Plan for Transitioning to the New Policy: For schools/districts that do not wish to continue ISWA agreements with VR, ISWA services shall be terminated to students in those schools/districts. VR Counselors shall notify participants in writing as soon as possible once the school/district has communicated the decision, and the student shall be given one month's notice prior to service termination (i.e., process payment for the current month and discontinue further ISWA services). The student's IPE shall be amended to reflect the service termination.



North Carolina Department of Health and Human Services
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Elizabeth W. Bishop
Division Director

MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: September 18, 2015
Re: **Interim Policy and Procedure Directive #06-2015: Transition Plan for Existing Status 10 Cases**

Effective October 1, 2015

Any case that has been in status 10 for 60 days or more must be reviewed and a decision made within 30 days to either:

- Develop an IPE
- Extend the timeframe and complete the Extension form
- Close the case



MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: April 19, 2016
Re: **Interim Policy and Procedure Directive #03-2016: Individual Placement and Support (IPS) Service Policy**

Effective May 1, 2016

Individual Placement and Support (IPS) is a person-centered, behavioral health service with a focus on employment, that provides assistance in choosing, acquiring, and maintaining competitive paid employment in the community for individuals 18 years and older with severe mental illness for whom employment has not been achieved or employment has been interrupted or intermittent. Research demonstrates that individuals who obtain competitive employment through IPS services have increased income, improved self-esteem, improved quality of life, reduced symptoms, and reduced mental health utilization. A supporting principle of IPS is the Integration of Mental Health Services and Rehabilitation. The IPS team may include case managers, therapists, counselors, nurses, housing specialists, peer specialists, substance abuse specialists, and medication prescribers in addition to the Employment specialist, and the VR counselor.

In addition to an individual being at least 18 years old, the following criteria must be met for consideration of IPS Services:

- A. Has a primary diagnosis of Serious Mental Illness (SMI) that includes Severe and Persistent Mental Illness (SPMI) and can include co-occurring disorders such as Substance Use. This may include a primary substance use disability with a secondary disability of mental illness.

AND

- B. Experiences difficulties in at least two or more of the following areas:
 1. In or at risk of placement in a congregate setting or difficulty maintaining safe living situations, including homelessness



2. Co-occurring mental health and substance use disorders
3. High risk of crisis diversion, intervention, including hospital transitions
4. Difficulty effectively using traditional office-based outpatient services
5. Difficulty with daily living, communication, interpersonal skills, self-care, self-direction
6. High risk or recent history (within 12 months) of criminal justice involvements (such as arrest, incarceration, probation)

AND

- C. Expresses the desire to work, and has an established pattern of unemployment, underemployment, or sporadic employment; and requires assistance in obtaining or maintaining employment in addition to what is typically available from the employer because of functional limitations as described above and behaviors associated with the individual's diagnosis

To consider IPS for an individual, the above criteria must be met. The case record must contain documentation of disability according to VR policy standards. The intended targeted population for IPS services is individuals classified Most Significantly Disabled individuals (MSD). The VR Counselor is required to consider functional limitation capacity areas broadly and gather information from the IPS Team and individual that may assist in determining hidden factors that warrant the need for ongoing, indefinite wrap around support. In rare instances an individual may not meet the MSD criteria but will benefit from the wrap around supports offered by this model of employment. Consultation with the Program Specialist for Mental Health and Substance Abuse is recommended if there are questions regarding the appropriateness of providing IPS services to a client classified as Significantly Disabled (SD). Under no circumstances will a client classified as non-SD be considered for IPS services. IPS Services are comprised of the following:

1. **Intake:** A document including demographic information, disability information and completed by the IPS provider.
2. **Career Profile:** A document in which the employment specialist records job preferences, work history, education history, strengths, legal history and other information pertinent to a person's employment or education goals. This information is gathered through interviews with the consumer, therapist, and family members.
3. **IPS Job Development and Retention:** A systematic approach to job development very similar to NCDVR dual customer approach. Includes (3) three days of documented supports.
4. **IPS Job Support and Vocational Recovery:** Job Support begins on day 4 (four) of employment and may be conducted on or off job site. These services may involve development of stress management techniques to be used at home or on the job, organization of activities of daily living to ensure a smooth transition to work, or other non-traditional activities to promote success at work. IPS Job Support ends on the agreed upon date that the VR counselor and IPS team feel the consumer is stable on the job. Vocational Recovery begins the following day and begins the provision of indefinite supports. The

90 day employment counts begins when vocational recovery/indefinite support is initiated.

5. **IPS Closure:** Occurs 90 days after indefinite supports begin and all other services on the IPE have been completed.
6. **Peer Support:** Services provided by an individual with lived experience of mental illness who is hired as part of the IPS team and provides supports that will enhance the service delivery.
7. **Behavioral Health Interventions:** Interventions provided by the therapist, case manager, or psychiatrist to enhance success at work.
8. **Indefinite Support:** Supports offered through Peer Specialists, Mental Health therapists, Employment Specialists and other members of the IPS team once Vocational Recovery begins.
9. **Supported Education:** Occurs when a consumer's educational goal is related to the employment goal. The IPS Team, including the VR Counselor, may provide supports such as assistance in researching training options, establishing learning accommodations, investigating financial aid, and assisting with the development of effective study habits. The VR Counselor may consider funding the training. This service would not generally be provided simultaneously with employment services, but would be appropriately utilized when training is a viable option and would enhance employability.

In an effort to promote sustainability of IPS, the IPS Team uses braided funding to pay for services. When we have an NCDVR issued IPS contract, the following occurs:

1. Intake (Funded by alternate sources)
2. Career Profile (Funded by alternate sources)
3. IPS Job Development and Retention (IPS Milestone funded by VR)
4. IPS Job Support and Recover (IPS Milestone funded by VR)
5. IPS Closure (IPS Milestone funded by VR)
6. Peer Support Services (Funded by alternate sources)
7. Behavioral Health Interventions (Funded by alternate sources)
8. Indefinite Support (Funded by alternate sources)

Funds from NCDVR as well as alternate sources shall comprise 100% of the braided funding for IPS services. NCDVR milestones are payable one time per life of the case, without regard to any comparable benefits, including Medicaid. Alternate funding, including Medicaid will sponsor the components once the VR milestones have been exhausted.

If an IPS Contractor does not have NCDVR funding, all service delivery is funded by the LME/MCO. NCDVR continues to be an active participant in the service delivery regardless of funding source. Supporting documents as indicated below should be requested from the IPS provider.

Milestone Definitions:

IPS Job Development and Retention Milestone 1 (\$3200)

IPS Job Development and Retention involves consumer specific job development and placement and time spent analyzing information relevant to a consumer's job development/placement. The Contractor shall locate jobs through networking with employers, businesses and community leaders resulting in securing a position that matches the skills, abilities, motivation, interests, needs, and goals of the consumer to ensure the greatest chance of success on the job. The consumer shall be hired and maintain employment for three (3) days with documented job supports provided during the three (3) days. The placement must be in a position that matches the vocational goal on the Individualized Plan for Employment (IPE) or the amended/agreed upon vocational goal.

- a) The IPS Contractor shall have scheduled face-to-face meetings at least monthly with Division counselors to discuss progress in job search.
- b) The IPS Contractor shall provide to the Division a written summary of job development activities for each consumer through BEAM including the Employer Contact Log, Individualized Job Support Plan (IJSP), and updated Person Centered Plan (PCP) with support goals.
- c) The IPS Contractor shall notify the Division (in writing) when the consumer has accepted employment. Upon approval, the Contractor shall complete and submit the New Hire Form to the Division through BEAM.
- d) The Contractor shall submit the IPS Job Development and Retention Outcome and the required documentation, (monthly job development summary, employer contact log, IJSP, and new hire form), through BEAM for payment within five (5) working days of the successful completion of the service.

IPS Job Support and Vocational Recovery Milestone 2 (\$1600)

IPS Job Support and Vocational Recovery Milestone shall include the needed supports that are consumer driven in order to be successful on the job. The length of time in this milestone is individualized based on consumer need and *typically* lasts about 30 days. However, an individual may require more or less job support intensity when initially employed based on their work experience and disability. These supports result in the consumer beginning vocational recovery which initiates the indefinite supports.

IPS Job Support and Vocational Recovery shall meet the needs of the consumer and may include behavioral health intervention, assistance from family members, friends, coworkers, natural supports, and the Contractor. IPS Job Support and Vocational Recovery may be delivered on or off the job site, depending on the needs and requests of the consumer. IPS Job Support and Vocational Recovery may also include employment advocacy time (time spent advocating for the consumer with persons at the employment site for purposes directly related to employment), non-employment advocacy time, and community resource training.

At a minimum, the Contractor shall meet weekly with the consumer for the first month either on or off the job site as determined by the needs and requests of the consumer.

At the end of the first month, in consultation and agreement with the consumer and the Division, the consumer begins Vocational Recovery, and indefinite supports start. In all cases, the IPS Job Support and Vocational Recovery phase shall include the following elements and subsequent documentation:

- a) The Contractor shall identify and/or provide different types of supports necessary for the consumer to be successful in employment. The Individualized Job Support Plan (IJSP) will be maintained in the consumer file.
- b) The Contractor shall complete a weekly summary of the consumer's progress toward completing the job support plan. Documentation shall be maintained in the consumer file.
- c) In consultation with the consumer, the Contractor shall inform the Division that Vocational Recovery has begun when the objectives on the individualized job support plan have been completed. Documentation to support the start date of Vocational Recovery shall be provided to the Division.
- d) The Contractor shall schedule and participate in monthly staffings with the Division to update progress towards meeting the consumer's vocational goal with a written report submitted to the Division through BEAM within five (5) working days of the staffing.
- e) The Contractor shall submit IPS Job Support and Vocational Recovery Milestone and the required documentation, (IJSP, weekly progress reports, staffing reports), through BEAM for payment within five (5) working days of the successful completion of the service.

IPS Closure Milestone 3 (\$2000)

IPS Closure Milestone is established when the consumer has worked at least 90 days after Vocational Recovery begins, and the Division has successfully closed the case file.

- a) The Contractor shall provide a written plan for the provision for indefinite supports. Indefinite supports are individualized services that are provided as often and as long as the person needs it to maintain successful employment.
- b) The Contractor shall submit 30, 60, and 90 day job support notes. The Contractor shall submit IPS Closure Milestone and the required documentation, (job support notes and indefinite supports written plan), through BEAM within five (5) working days of the successful completion of the service.

IPE Considerations:

The IPS plan type will be auto-populated if answering yes to any of the IPS questions on the Certification of Eligibility form. If it is determined that IPS services are NOT going to be provided the plan type can be changed. Do not edit the questions on the Certification of Eligibility form.

When adding IPS to the IPE, the VR counselor should add a statement in the Counselor Comment section addressing the ongoing, indefinite supports provided after VR case closure. These support typically last a year, although a client may choose to end these services before receiving them for a year.



MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: **November 7, 2016**
Re: **Interim Policy and Procedure Directive #07-2016: Competitive Integrated Employment**

Effective: November 15, 2016

Background:

The principle that individuals with disabilities, including those with the most significant disabilities, are capable of achieving high quality competitive integrated employment, when provided the necessary services and support, is incorporated throughout the Workforce Innovations Opportunity Act (WIOA), part 361, from the statement of program purpose in §361.1 to the requirement in §361.46(a) that the Individualized Plan for Employment include a specific employment goal that is consistent with the general goal of competitive integrated employment.

The integrated location criteria within §361.5(c) (9)(ii), ensures that participants in the VR program, including individuals with the most significant disabilities, are afforded a full opportunity to integrate in their communities and to achieve employment available to the general public. An integrated setting must be one that is typically found in the community, specifically the competitive labor market. The setting must be one in which the employee with the disability interacts with employees without disabilities in the work unit and across the work site to the degree that employees without disabilities in similar positions interact with these same persons.

The focus of whether the setting is integrated should be on the interaction between employees with and without disabilities, and not solely on the interaction of employees with disabilities with people outside of the work unit. For example, the interaction of individuals with disabilities employed in a customer service center with other persons over the telephone, regardless of whether these persons have disabilities, would be insufficient by itself to satisfy the definition.

Instead, the interaction of primary consideration should be that between the employee with the disability and his or her colleagues without disabilities in similar positions. Consideration to the interaction between employees with disabilities and those without disabilities engaged in performing work responsibilities, must be specific to the performance of the employee's job duties, and not the casual, conversational, and social interaction that takes place in the workplace.



The “work unit” may refer to all employees in a particular job category or to a group of employees working together to accomplish tasks, depending on the employer’s organizational structure. The interaction between employees with and without disabilities need not be face to face. Employment settings in which individuals work alone, such as telecommuting, temporary employment, and work in mobile or scattered locations, are not excluded from the scope of the definition of “competitive integrated employment,” so long as the employee with the disability interacts with employees of the employer in similar positions and interacts with other persons without disabilities to the same extent that employees without disabilities interact with others.

The factors that generally would result in a business being considered “not typically found in the community,” include: (1) the funding of positions through Javits-Wagner-O’Day Act (JWOD) contracts; (2) allowances under the Fair Labor Standards Act (FLSA) for compensatory subminimum wages; and (3) compliance with a mandated direct labor-hour ratio of persons with disabilities. These factors must be taken into account when determining if a position in a particular work location is an integrated setting.

Further, when the criteria are applied, group and enclave employment settings operated by businesses formed for the purpose of employing individuals with disabilities will not satisfy the definition of “competitive integrated employment.”

Requirements:

Employment in businesses owned by community rehabilitation providers, group settings, affirmative industries, social enterprises, and other forms of non-traditional work settings must be evaluated on a case-by-case basis. A competitive integrated employment review must be conducted by a CRP Specialist whenever one or more of the competitive integrated employment criteria are in question:

- Purpose of the business
- Competitive wages
- Integrated location
- Opportunities for advancement

The counselor must refer to the CRP Specialist when a placement is being considered in circumstances as described above. The CRP Specialist will coordinate a review of the employment setting to determine whether a work location is in an integrated setting, meaning it is typically found in the community, and it is one in which the employee with the disability interacts with employees and other persons, as appropriate to the position, who do not have disabilities to the same extent that employees without disabilities interact with these persons. Finally, consideration must be given to the interactions that take place between employees with disabilities and other persons for the purpose of performing his or her job duties, not mere casual and social interaction.

The CRP specialist will complete a written report documenting the determination of the review. This report should be filed in the case record for audit purposes.



North Carolina Department of Health and Human Services
Division of Vocational Rehabilitation Services

Roy Cooper
Governor

Dempsey E. Benton
Interim Secretary

Claudia B. Horn, M.S.
Senior Director

Tara K. Myers
Division Director

MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: **January 17, 2017**
Re: **Interim Policy and Procedure Directive #01- 2017 WIOA -
Subminimum Wage Requirements**

Effective Immediately

Subminimum Wage Requirements

If an individual earning subminimum wage becomes known to VR, the Workforce Innovation and Opportunity Act (WIOA) section 511 requires that:

1. VR must provide career counseling and information and referral to other available local programs to assist with achieving competitive integrated employment.
2. The subminimum wage employer must inform the individual about self-advocacy, self-determination and peer mentoring training opportunities if available. The training opportunities must not be provided by an entity that has any financial interest in the individual's employment outcome, including any entity that holds a section 14 (c) certificate.

For individuals who were already employed at subminimum wage when section 511 took effect (July 22, 2016), the individual must receive career counseling and information and referral services at least once a year.

For individuals who begin employment at subminimum wage on or after the effective date of section 511 (July 22, 2016) the individual must receive career counseling and information and referral services every six months for the first year after beginning employment and annually thereafter.

For individuals working at subminimum wage for employers with fewer than 15 employees VR must also inform the individual about self-advocacy, self-determination and peer mentoring training opportunities available.



The required timeframe in which to provide the above noted services begins on the date the individual becomes known to VR. An individual can become known to VR by any method including self-referral or referral from any other source.

Career Counseling/Information & Referral Documentation Requirements

Documentation of completion must be provided to the individual as soon as possible, but no later than 30 calendar days after completion of the career counseling unless there are exceptional and unforeseen circumstances. The following forms are required:

- Form VR-0511-C: Certificate of Completion for Career Counseling
- Form VR-0511-IR: Information and Referral Services Report (list of programs/agencies individual was referred to)
- Form VR-0511-DOC: Record of Career Counseling, Info & Referral, Transition or PETS Services Received (documentation of services provided as required by Section 511)

A copy of each must be given to the individual and the employer and a copy retained by the local VR office.

Additional requirements for Youth with Disabilities

A Youth with a Disability is defined as an individual with a disability between the ages of 14 and 24.

In order for a Youth with a Disability to be placed in a subminimum wage setting the following must occur prior to employment:

1. The individual must receive either PETS services from VR while qualifying as a Student with a Disability or transition services under IDEA from a school setting.
2. The individual must apply for VR services and:
 - a. The individual must be determined ineligible for VR services. An individual cannot be determined ineligible due to the severity of the disability without first engaging in a trial work plan (Section: 3-3). SSI/SSDI recipients must be presumed eligible if they intend to reach an employment outcome.

OR

- b. The individual must be determined eligible and after receiving services under an IPE for a reasonable period of time be unsuccessful in achieving competitive integrated employment. A reasonable period of time is defined as the anticipated time frame to receive services on the IPE. For supported employment this may be 24 months with extensions if justified.

AND

3. VR must provide career counseling and information about and referral to other resources available locally that offer employment-related services and supports designed to enable the individual to explore, discover, experience and attain competitive integrated employment.

Documentation Requirements

- The following documents must be provided to the individual no later than 30 days after completion of the specific service or decision:
 - Form VR-0511-C: Certificate of Completion for Career Counseling (one completed for each PETS service received)
 - Form VR-0511-DOC: Record of Career Counseling, Info & Referral, Transition or PETS Services Received
 - Certificate of VR Eligibility/Ineligibility
 - Supported Employment Progress Reviews/Documentation

The above noted must be documented clearly in the VR case file. Before employing a youth at subminimum wage the employer with a special wage certificate must review written documentation of the above and maintain a copy. An updated and fully completed *Form VR-0511-DOC: Record of Career Counseling, Info & Referral, Transition & PETS Services Received* should adequately document the PETS and Transition services the individual has received and the outcome of the VR program's efforts to assist the individual to obtain competitive integrated employment. This should be viewed as a legal document that will be audited.

Informed Choice and Participation Refusal

Individuals with disabilities continue to have a continuum of choices and options for employment ranging from competitive integrated employment to employment at subminimum wage. Therefore, individuals with disabilities choosing to pursue or continue in subminimum wage may do so; however, the requirements noted above must be satisfied before the employer hires or continues to employ them at subminimum wages. The required activities as noted above are different for youth and adults. Both Youth and Adults with Disabilities must complete the Career Counseling/Information & Referral Service. Youth with Disabilities must also complete all of the additional requirements including participating in the VR process.

Individuals who choose not to participate in the required activities are prohibited from earning subminimum wages. Employers may choose to pay minimum wage in order to continue to employ these individuals.

Form VR 511-DEC Documenting Refusal of Services required of section 511 must be completed with a copy given to the individual within 10 days after refusing participation. A copy must be retained in the VR office.



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CLAUDIA B. HORN, M.S.
SENIOR DIRECTOR

TARA K. MYERS
DIVISION DIRECTOR

MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: March 7, 2017
Re: Interim Policy and Procedure Directive #05-2017: Amendments when converting ISWA to PETS In-School Work Adjustment Service

Effective Immediately

A ***PETS In-School Work Adjustment Service*** has been created to track expenditures of this service as required by WIOA. The existing ISWA service will remain for a period of time to allow existing authorizations to continue to be utilized without amending the IPE.

There are two current options:

1. Use the existing ISWA Service on any existing plans/ authorizations until those authorizations have been exhausted and then add the PETS Case Information Form, amend the IPE with the new PETS Service and issue a new authorization.
2. Add the PETS Case Information Form and then amend the IPE with the new PETS Service. Cancel the balance on the old authorization and create a new authorization with the new service

Regardless of which option is selected, the following guidelines apply to cases in which ISWA is currently being provided:

- Complete the amendment by changing the existing ISWA service to ***PETS In-School Work Adjustment Service***.
- The counselor and supervisor if required should electronically sign and date the amendment.
- Print the amendment.

- If the client (and guardian if applicable) is readily available, s/he should sign and date the amendment.
- Electronically sign and date the amendment for the client.

However, if the client (and guardian if applicable) is not readily available, and if obtaining a signature would result in a delay of services, the requirement to obtain a client signature is waived:

- Sign and date the amendment for the client.
- Print the amendment
- Attach a copy of this Policy Directive to the amendment for audit purposes



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MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: June 16, 2017
Re: Interim Policy and Procedure Directive #06-2017: WIOA – Transitional Employment

Effective July 1, 2017

The Workforce Innovation and Opportunity Act (WIOA) prohibits VR agencies from successfully closing individuals in Transitional Employment. As a result of this legislation, VR will no longer make referrals for Transitional Employment nor will we close cases successfully in Transitional Employment.

There are only three Transitional Employment programs currently in NC:

- The Mental Health Fund dba Connections – Newton NC
- Cleveland Psychosocial Services, Inc. dba Adventure House – Shelby NC
- Threshold, Inc. – Durham NC

Current consumers receiving Transitional Employment can continue to receive these services through completion but cannot be closed successfully as a Transitional Employment outcome.



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MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: June 16, 2017
Re: Interim Policy and Procedure Directive #07-2017: Functional Electrical Stimulation (FES) or Foot Drop Stimulator (FDS) Systems

Effective July 1, 2017 NCDVRS will not sponsor Functional Electrical Stimulation (FES) or foot drop stimulator (FDS) systems. There is not enough data to support the medical or vocational benefits from the use of these devices at the present time. More specifically, clinical evidence does not demonstrate sufficient improvement in function, sustainable over a whole workday and work week, that would be great enough to make a substantial meaningful difference in the types of jobs an individual can perform or in increasing an individual's independence.



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MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: **July 13, 2018**
Re: **Interim Policy and Procedure Directive #03-2018:
Documents to be Signed and Retained in the Case Record**

Effective: August 1, 2018

Until we have a completely paperless case management system, it will be necessary to maintain a hard copy case record. This policy directive identifies specific BEAM generated documents that must be printed and maintained in the hard copy case record. All documents that require a client/guardian signature must be printed in their entirety, signed by the client/guardian, and retained in the case record. There are other documents that must be printed and given to the client. For auditing purposes and consistency, these documents should also be copied for the case record.

Specific documents include:

- Agreement of Understanding/Application
- Release of Information Forms
- Eligibility Decision Letter
- Financial Needs Survey - when client signature is required
- BANC Form – when applicable
- IPE
- Progress reviews
- Annual reviews
- Revisions
- Amendments

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- Social Security Administration Information Form when used for presumption of eligibility or verification of the Financial Needs Survey
- Documents (email correspondence, memos) verifying approval external to BEAM. Example: policy exceptions
- Documents created by a CIC, AUM that require approval by UM. Examples include status 26 closures, FNS with categories of excess income applied and extenuating circumstances.
- Documentation verifying that benefits counseling information has been shared with SSI/DI recipients at the time of IPE development

It is not required to print and retain the following, but at the discretion of the counselor may be printed and retained in the case record:

- WRAP
- Authorizations
- Joint VR/IL Cases – not required to print concurrent documents
- Certification of Eligibility



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MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: July 1, 2019
Re: Interim Policy and Procedure Directive #02-2019: Direct Express

Effective: July 15, 2019

Cross reference: Section 3-10: Financial Need and Client Resources

Recipients of Social Security benefits have the option of using Direct Express or Netspend for the deposit of funds. Recently both Direct Express and Netspend have changed their processes for providing written balance statements and verification of funds by phone. Recipients may now only request a statement for the current month, rather than three months as required by FNS policy. The following adjustment is being made to the requirement to obtain three months of statements from a client and any applicable family members:

- SSI recipient only (no SSDI/retirement) – no verification from Direct Express or Netspend is required. The recipient should sign the BANC form indicating they have no additional accounts.
- SSDI/Retirement – only one current (within the past 30 days) statement is required to meet the policy requirement noted in the FNS policy. If the recipient is unable to obtain one statement, the Unit Manager can review the specific circumstances and approve waiving this requirement as allowed in Extenuating Circumstances.

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MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: August 1, 2019
Re: Interim Policy and Procedure Directive #04-2019: Revised Paper Application

Effective: August 15, 2019

Interim Use of Revised Paper Application For VR Services/Agreement of Understanding

Background:

The Application /Agreement of Understanding has been updated as follows:

- Incorporating the NVRA Voter Registration Preference Form as a medium to document in writing that every applicant was extended the opportunity to register to vote;
- Additional language informing applicants of our need to access databases with information relevant to service provision needs and reporting requirements;
- Informing applicants of the risks associated with digital communications and social networking.
- The Parental/Guardian Consent Form primarily used by transition counselors to initiate the application process is no longer required. In order to comply with the NVRA Voter Requirements this component was incorporated into the revised paper Application for VR Services.

Until further notice, the paper application will need to be used with every new applicant and will need to be thoroughly completed with all signatures and appropriate boxes checked within the Voter Registration Preference section of the application. There is no need to re-do any application that was taken prior to the effective date of this directive.

Once the paper copy has been signed by all required individuals, the electronic BEAM case management version will need to be electronically dated and signed (via electronically dating).

The hard copy is to be retained in the official case record and it is preferred to have the completed document scanned and uploaded within the electronic case management system as a case note attachment to facilitate case reviews and audits.

The objective is to have the application incorporated within BEAM case management system, which will require development. Templates of the interim applications will be made available via the SharePoint site under Forms>BEAM Forms> beam_VR_application_agreement_revised.

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MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: **May 1, 2020**
Re: **Interim Policy and Procedure Directive #04-2020 WIOA -
Subminimum Wage Requirements**

Effective May 15, 2020

Subminimum Wage Requirements

If an individual earning subminimum wage becomes known to VR, the Workforce Innovation and Opportunity Act (WIOA) section 511 requires that:

1. VR must provide career counseling and information and referral to other available local programs to assist with achieving competitive integrated employment.
2. The subminimum wage employer must inform the individual about self-advocacy, self-determination and peer mentoring training opportunities if available. The training opportunities must not be provided by an entity that has any financial interest in the individual's employment outcome, including any entity that holds a section 14 (c) certificate.

For individuals who were already employed at subminimum wage when section 511 took effect (July 22, 2016), the individual must receive career counseling and information and referral services at least once a year.

For individuals who begin employment at subminimum wage on or after the effective date of section 511 (July 22, 2016) the individual must receive career counseling and information and referral services every six months for the first year after beginning employment and annually thereafter.

For individuals working at subminimum wage for employers with fewer than 15 employees, VR must also inform the individual about self-advocacy, self-determination and peer mentoring training opportunities available.

The required timeframe in which to provide the above noted services begins on the date the individual becomes known to VR. An individual can become known to VR by any method including self-referral or referral from any other source.

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Career Counseling/Information & Referral Documentation Requirements

Documentation of completion must be provided to the individual as soon as possible, but no later than 30 calendar days after completion of the career counseling unless there are exceptional and unforeseen circumstances. The following forms are required:

- Form VR-0511-C: Certificate of Completion for Career Counseling
- Form VR-0511-IR: Information and Referral Services Report (list of programs/agencies individual was referred to)
- Form VR-0511-DOC: Record of Career Counseling, Info & Referral, Transition or Pre-ETS Services Received (documentation of services provided as required by Section 511)

A copy of each must be given to the individual and the employer and a copy retained by the local VR office.

Additional requirements for Youth with Disabilities

A Youth with a Disability is defined as an individual with a disability between the ages of 14 and 24.

In order for a Youth with a Disability to be placed in a subminimum wage setting the following must occur prior to employment:

1. The individual must receive either Pre-ETS services from VR while qualifying as a Student with a Disability or transition services under IDEA from a school setting.
2. The individual must apply for VR services and:
 - a. The individual must be determined ineligible for VR services. Note: An individual who intends to achieve a competitive integrated employment outcome cannot be determined ineligible due to the severity of the disability without first engaging in a trial work plan.
 - b. An individual receiving SSI/SSDI cannot be determined ineligible if she or he intends to reach a competitive integrated employment outcome.
 - c. An individual who does not intend to achieve a competitive integrated employment outcome will be determined ineligible. The Certificate of Ineligibility must document that the client does not intend to achieve a competitive integrated employment outcome.

OR

- d. The individual must be determined eligible and after receiving services under an IPE for a reasonable period of time be unsuccessful in achieving competitive integrated employment. A reasonable period of time is defined as the anticipated time frame to receive services on the IPE. For supported employment this may be 24 months with extensions if justified.

AND

3. VR must provide career counseling and information about and referral to other resources available locally that offer employment-related services and supports designed to enable

the individual to explore, discover, experience and attain competitive integrated employment.

Documentation Requirements

- The following documents must be provided to the individual no later than 30 days after completion of the specific service or decision:
 - Form VR-0511-C: Certificate of Completion for Career Counseling (one completed for each Pre-ETS service received)
 - Form VR-0511-DOC: Record of Career Counseling, Info & Referral, Transition or Pre-ETS Services Received
 - Certificate of VR Eligibility/Ineligibility
 - Supported Employment Progress Reviews/Documentation

The above noted must be documented clearly in the VR case file. Before employing a youth at subminimum wage the employer with a special wage certificate must review written documentation of the above and maintain a copy. An updated and fully completed *Form VR-0511-DOC: Record of Career Counseling, Info & Referral, Transition & Pre-ETS Services Received* should adequately document the Pre-ETS and Transition services the individual has received and the outcome of the VR program's efforts to assist the individual to obtain competitive integrated employment. This should be viewed as a legal document that will be audited.

Informed Choice and Participation Refusal

Individuals with disabilities continue to have a continuum of choices and options for employment ranging from competitive integrated employment to employment at subminimum wage. Therefore, individuals with disabilities choosing to pursue or continue in subminimum wage may do so; however, the requirements noted above must be satisfied before the employer hires or continues to employ them at subminimum wages. The required activities as noted above are different for youth and adults. Both Youth and Adults with Disabilities must complete the Career Counseling/Information & Referral Service. Youth with Disabilities must also complete all of the additional requirements including participating in the VR process.

Individuals who choose not to participate in the required activities are prohibited from earning subminimum wages. Employers may choose to pay minimum wage in order to continue to employ these individuals.

Form VR 511-DEC Documenting Refusal of Services required of section 511 must be completed with a copy given to the individual within 10 days after refusing participation. A copy must be retained in the VR office.



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MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: **June 1, 2020**
Re: **Interim Policy and Procedure Directive #07-2020: Background Checks**

Effective: Immediately

Background Checks
[revised 3/26/2021]

As part of the rehabilitation process it is sometimes useful to have detailed information about a client's criminal history. On occasion clients are not fully aware of all convictions and thus accurate information can be a helpful tool for vocational counseling, determination of appropriate services and/or employment goals. Background checks may be purchased from approved vendors to aid in the rehabilitation process.

- Under no circumstances will these background checks be given to employers or used in lieu of the employer's required screening process.
- VR sponsored background checks may not be conducted for participation in any CRP service.

Clients must provide written consent to obtaining a background check. Some DVRS approved vendors may supply their own consent forms for clients to sign as part of the referral process. If a vendor does not provide consent forms prior to requesting a background check, written consent using the [Consent for Release of Non-Medical Information](#) must be obtained. In addition, the client must sign the [Authorization Disclosure Form DVR-1030](#) which provides specific information regarding his/her rights under the Fair Credit Reporting Act. A copy of the forms must be attached to the Consent form and copies given to the client.

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MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: July 15, 2020
Re: Interim Policy and Procedure Directive #11-2020: Benefits Counseling Services for SSI/SSDI Beneficiaries

Effective: August 1, 2020

Cross reference Chapter 4 Comprehensive Assessment

The Ticket to Work and Work Incentives Improvement Act of 1999 authorized Social Security to expand the utilization of community-based Benefits Counseling (Work Incentives Planning and Assistance (WIPA) to SSI/SSDI recipients. The goal of WIPA is to provide SSI/SSDI beneficiaries with accurate information regarding work and how their benefits can be impacted so that they can make a successful transition to employment.

WIPA regulations target service provision to high priority individuals. High priority recipients include interested individuals who are actively working or engaging in self-employment, and those who are actively seeking employment or self-employment.

High priority beneficiaries will receive individualized benefits counseling to include an assessment and written report. Lower priority recipients will generally not receive individualized benefits counseling. Rather, they may receive basic information about the effect of SSI/DI benefits on employment.

Refer to <https://www.ssa.gov/redbook/eng/resources-supports.htm> for additional information regarding WIPA Benefits Counseling

DVRS recognizes the value of benefits counseling to all recipients of SSI/SSDI. Therefore, as a result of an ongoing unmet need statewide for broader access to benefits counseling, NCDVR has established a service entitled Benefits Counseling – Fee for Service to sponsor benefits counseling to SSI/SSDI beneficiaries requiring this service when individualized benefits counseling is not available through WIPA. Prior to sponsoring this service counselors should explore whether DVRS WIPA Benefits Counseling is available. Established rates for this service are located in Volume V. This service is not subject to financial need, but comparable benefits should be used when available.

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Benefits Counseling – Fee for Service:

Specific Benefits Counseling services within the scope of this VR funded service include:

Information and Referral (I&R): I&R consultations should provide information to answer simple or generic questions about benefits or work supports. It can also introduce the discussion of basically how work affects benefits. Generally, individuals should be able to receive this information in one or two brief sessions. VR Counselors should receive a basic summary of what information was discussed in these sessions from the benefits counselor. (A document that is in BEAM called a Benefits Planning Summary can be updated and used for this purpose if needed).

Benefits Summary and Analysis: Involves more intensive and ongoing direct assistance to a beneficiary in the development of a comprehensive assessment of how a specific job and earnings will affect all benefits received. This assessment will result in the creation of a Benefits Summary and Analysis report, which will require ongoing monitoring to determine if any revision to the report is needed due to changes in employment (raises, changes in hours worked, loss of employment, etc.) Included in this assessment/report are recommendations to the effective use of work incentives, which are special rules that make it possible for people with disabilities receiving Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI) to work and still receive monthly payments and Medicare or Medicaid. Although ongoing, follow up should be intermittent or on an as needed basis.

The VR Counselor or designee will issue an authorization to approved vendors for the specific category as noted above. The following should be used to determine the total amount of the authorization:

Information and referral	Not to exceed 3 hours (\$120)
Benefits Summary and Analysis	Not to exceed 5 hours (\$200)

The vendor will provide the service as requested and submit a report and invoice to the VR Counselor who will approve the payment through BEAM. The invoice must contain the specific number of hours provided.



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MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: July 15, 2021
Re: **[REVISED]** Interim Policy and Procedure Directive #05-2021:
Post-Secondary Training Programs for Persons with Intellectual
Disabilities (ID)

Effective: August 1, 2021

According to the Higher Education Opportunity Act of 2008, Comprehensive Transition Programs (CTPs) are postsecondary training programs for persons with intellectual disabilities (ID) intended to promote inclusion of students in academic institutions through participation in coursework, integrated work experiences, and extracurricular activities. As a part of these inclusive experiences, students focus on academic enrichment, socialization, independent living, and vocational skills. CTPs may be found in public and private colleges and universities.

Students admitted to CTPs may be eligible for Pell Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), or Federal Work Study (FWS). Postsecondary training programs for persons with ID vary in the type of programming, program length, and cost.

Comprehensive Assessment

As a part of the comprehensive assessment and the transition planning process (for transition-aged clients), VR Counselors are encouraged to provide guidance and counseling for clients with ID who are interested in attending post-secondary training programs as an option for improving one's job readiness. When provided to an individual who can be classified as a *student with a disability* who qualifies for pre-employment transition services, this guidance and counseling should be reported as a Pre-ETS Required Activity (Counseling on Opportunities for Enrollment in Comprehensive Transition or Postsecondary Education Programs). As a part of informed choice, factors that potential students may consider include the specific program admission requirements, the length of the training program, the location of the program, the cost of the program, adult services required to support one's participation in the program, and the client's anticipated place of residence upon completion of the training program.

VR Counselors should consider other VR services that may be required to support the client's successful participation in the CTP and that prepare the client for the client's IPE employment outcome. This may include, but is not limited to, services offered by a community rehabilitation program, such as community-based assessment, or other VR services, such as vocational

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evaluation. Because many CTPs provide placement and coaching supports for work-based learning activities, the Division shall not provide CRP services that are duplicative of CTP services and supports.

Clients in their final semester may be referred for supported employment or other appropriate placement and job training services, if required. The client's availability and readiness to pursue a competitive employment outcome shall be considered. The client's intended permanent residence should also be considered when selecting a community rehabilitation program, if required.

CTP Student Progress

The VR counselor shall obtain grade/progress reports on the client's course-related activities for each semester sponsored by the Division. Additionally, the VR Counselor is encouraged to participate in student planning/progress meetings when arranged by the CTP as a means for monitoring the client's progress and coordinating and aligning service plans. If reports demonstrate a client's lack of progress (e.g., failure to attend/participate, consistent decline in work behaviors and job readiness skills, no longer intending to pursue competitive, integrated employment at program completion), sponsorship will be discontinued after the client has been provided with written notification one semester prior to the change. In order to re-initiate Division sponsorship, the client must complete at least one (1) semester without Division sponsorship and demonstrate that the issue(s) impeding progress have been addressed.

Financial Sponsorship

The Division may sponsor tuition and fees, along with program-specific fees, according to Volume V rates for up to eight (8) semesters for four-year programs and up to four (4) semesters for two-year programs. Exceptions to the number of semesters must be approved by the Chief of Policy. The host training institution must be an approved vendor for the CTP service. Any institution not already approved as a vendor with the Division for the CTP service should be reviewed with the Program Specialist for Transition Services prior to completing the vendor review process and committing the Division's financial support. Sponsorship of CTP tuition and fees and program-specific fees is subject to financial need, and comparable benefits must be applied. Therefore, prospective or enrolled students should complete the Free Application for Federal Student Aid (FAFSA) each academic year for which Division support is desired.

Support services may also be sponsored by the Division at Volume V rates. This may include room and board, transportation, and supplies or equipment required to participate. Support services are subject to financial need and comparable benefits must be applied.

[Higher Education Opportunity Act, P.L. 110-315, Section 709]

Post-Secondary Training Programs for Persons with Intellectual Disability (ID)

The Division has established payment rates for post-secondary training programs for person with ID that have been approved as a Comprehensive Transition Program (CTP).

- **Tuition and Fees for In-State, Public College/University** may be sponsored at the Division's undergraduate rates for that institution (see *Training – Post-Secondary, Colleges and Universities – Undergraduate*).
- **Tuition and Fees for Out-of-State or Private Colleges/Universities** may be sponsored up to the Division's undergraduate Out-of-State/Private Rate (see *Training – Post-Secondary, Colleges and Universities – Undergraduate*).
- **Program-Specific Fees for In-State, Public College/University** may be sponsored at the program's catalog rate.
- **Program-Specific Fees for Out-of-State/Private Colleges/Universities** may be sponsored at the program's catalog rate.
- **Maintenance (room and board)** may be sponsored according to in-state and out-of-state/private undergraduate rates published in this manual (see *Maintenance Services – Client, Undergraduate or Graduate Training Programs*)
- **Books and supplies** may be sponsored according to undergraduate rates published in this manual (see *Training – Post-Secondary, Colleges and Universities – Undergraduate*).

The following are CTPs that have been approved by the Division:

College/University	Program Name
In-State	
Appalachian State University	Scholars with Diverse Abilities Program (SDAP)
UNC-Greensboro	Integrative Community Studies (Beyond Academics)
Western Carolina University	University Participant (UP) Program
Out-of-State/Private	
Clemson University	ClemsonLIFE
Coastal Carolina University	Coastal Carolina LIFE
University of South Carolina	CarolinaLIFE
University of Tennessee – Knoxville	FUTURE Post Secondary Education Program
Winthrop University	Winthrop Think College Program



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KATHIE B. TROTTER, MS, CRC, LCMHC, CPM • Director

MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: **October 18, 2021**
Re: **Interim Policy and Procedure Directive #06-2021: Using Approved Videoconferencing Technologies to Provide Services Remotely**

Effective: October 18, 2021

Background

The objective of this policy directive is to provide guidance for the provision of services using NC DVRS-approved secure remote technologies (videoconferencing) in response to the COVID-19 Nationwide Public Health Emergency that will allow the Division to continue to serve and minimize risks to the population served.

Using videoconferencing technologies to provide services remotely is not appropriate for every consumer and every situation; therefore, it is imperative for staff to exercise their professional judgement along with the policy guidance provided in this directive to decide on the appropriateness of a remote service intervention for their consumer.

Further, guidelines and procedures within this directive are to assure service providers are utilizing secure technologies and required procedures to be compliant with current regulations for consumer protection.

Part I: General Provisions:

- 1) Approved Videoconferencing Technologies for Division Staff Use for Serving Consumers Remotely** : Microsoft Teams; Google G Suite Meet; *Zoom.gov*

NOTE: Only agency-licensed subscription-level versions of the software as supplied by the Division will be permitted for this activity.

Approved Videoconferencing Technologies for Service Provider Use with HIPAA Business Associate Agreement (BAA) in Place with Videoconferencing Service Provider and DHHS BAA: Licensed subscription applications of the following: Cisco Webex Meetings/Webex Teams; GoToMeeting; Zoom for Healthcare; Google G Suite Hangouts Meet; Microsoft Teams.

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Unapproved Technologies for Remote Services Delivery: No public-facing, unlicensed or freeware remote communication products (audio and video) will be approved for use in serving consumers, including: Facebook Live; Twitch, TikTok, Slack, Skype (freeware).

- 2) **Use Restrictions:** NC DVRS-approved videoconferencing technologies can be used for confidential videoconference discussions and live review (display) of documents.
 - It is NOT permissible to:
 - record sessions with consumers;
 - upload, insert within chat, or store consumer-related documents within the application.
- 3) **Accessibility Requirements:** Staff and service providers shall reasonably accommodate the disability-specific needs of consumers to the greatest extent feasible when employing remote technologies to deliver services.
- 4) **Breaches:** Service Providers shall report security breaches or incidents while delivering services using remote technologies to the DHHS Privacy and Security Office <https://www.ncdhhs.gov/about/administrative-divisions-offices/office-privacy-security> within 24 hours of the incident. Staff shall report such an incident to the policy office dvr.m.policyoffice@dhhs.nc.gov within 24 hours. An example of a breach incident would be if an unauthorized individual accessed protected data during a closed videoconference session or through a practice commonly referred to “hijacking” where an uninvited unauthorized guest disrupts a videoconference session.
- 5) **Services outside the scope of this Directive:**
 - a. Medical telehealth or telepsychiatry appointments under the umbrella of a hospital, or healthcare provider network system, or service provider approved by NC Medicaid to provide such services.
 - b. CRP-related services under contract, including CRP-provided Pre-Employment Transition Services)
- 6) **Service Rates:** Service rates for purchased services using remote technologies will be based on the same payment methodologies used for comparable services provided in-person.
- 7) **Approved Services:** The following list of services can be provided using remote video conferencing methods by staff or by service providers approved by the policy office to provide services remotely. Only approved services can be provided remotely using videoconferencing technologies.

Exceptions or possible additions to this list must receive prior approval by the Chief of Policy.

- Assistive Technology/Consultation Services from NCATP—family of services
- Assistive Technology/Consultation Services -- (consultation, training)—family of services from other providers
- Benefits Counseling -- agency provided
- Benefits Counseling – purchased

- Community Inclusion Services
- Guidance and Counseling -- agency provided
- Employment Marketing Skills -- agency provided
- Job Club- agency provided
- Job Supports
- Pre-Employment Transition Services -- agency provided or purchased outside of contract
- Psychological Consultation
- Tutoring, academic support services
- Vocational Evaluation—agency provided or purchased

8) How to authorize services approved to be provided using remote technologies:

- When authorizing, specify that the service is to be provided remotely using approved remote technologies, including videoconferencing.
- Only authorize to service providers approved by the Division to provide services remotely as covered within the scope of this directive.

9) Serving minors and consumers with legal guardianship: Ensure permission is obtained by guardians prior to engaging minors or consumers with legal guardians using remote videoconferencing technologies and documented within the case.

Part II: Services Provided Directly by Agency Staff Using Approved Remote Technologies [Including NCATP]:

If staff need to engage consumers beyond traditional methods of phone, secure e-mail, and mail, through the use of videoconferencing, the consumer must be supported to understand this method and approach to service delivery and agree (consent) to receive services remotely. Remote service delivery is permissible only when using the approved technologies as specified within this directive. Staff are to follow the procedures for engagement and documentation as indicated.

Staff engaging consumers through Division-approved remote technologies must use a secure state network connection whenever possible or VPN (Virtual Personal Network) when working remotely. This ensures a secure network environment.

Consumer-related video conferencing sessions are not to be recorded, nor consumer-related documents stored within the application, as the privacy or protection of the stored information cannot be guaranteed. For example, it is okay to open and share (display) a consumer document (e.g., a resume or an IPE) while using the videoconferencing application; however, it is NOT okay to post a file to the chat feature of the application where it might be stored.

Approved Videoconferencing Technologies for Division Staff Use for Serving Consumers Remotely: Microsoft Teams; Google G Suite Meet; *Zoom.gov*

NOTE: Only agency-licensed subscription-level versions of the software as supplied by the Division will be permitted for this activity.

Procedures for Remote Service Delivery by Division Staff:

- **Consumer Notification:** Notify the consumer within an adequate timeframe to confirm an appointment where remote videoconferencing technology will be used. Include appropriate instructions on how to engage in videoconferencing, encouraging them to participate the best they can to enable their case to progress. Staff are to clearly identify themselves and their affiliation with the NC Division of Vocational Rehabilitation Services, commonly referred to as “VR.”
- When scheduling a videoconferencing appointment, staff are expected to notify consumers about the potential for privacy risks when using videoconferencing products. The following script shall be used and modified for comprehension as appropriate:

“Dear (consumer name),

NC Division of Vocational Rehabilitation (VR) has an alternative for providing services to you in light of the COVID-19 pandemic. In order to reach you and provide services, a videoconferencing solution can be used. Please be informed that there is a potential risk to your personal and protected health information when using remote technologies. However, the Division has taken measures to reduce these risks to the maximum extent possible. Would you like to proceed with a meeting with VR staff using videoconferencing? Yes or No”

- **Documentation:** The presentation of this statement, method of delivery, and response is to be documented in a case note.

Part III. Services Provided Remotely by Service Providers within the Scope of this Directive:

This section, along with applicable general provisions in Part I above apply to service providers:

Approved Videoconferencing Technologies for Service Provider Use with HIPAA Business Associate Agreement (BAA) in Place with Videoconferencing Service Provider and DHHS BAA: Licensed subscription applications of the following: Cisco Webex Meetings/Webex Teams; GoToMeeting; Zoom for Healthcare; Google G Suite Hangouts Meet; Microsoft Teams.

Accessibility Requirements: Service providers shall reasonably accommodate the disability-specific needs of consumers to the greatest extent feasible when employing technologies to provide services remotely.

Process for Approving Service Providers for Remote Service Delivery:

Existing approved NCDVRS service providers who currently provide in-person services above and are seeking approval to provide a remote version of the service must be approved to do so prior to providing such services to ensure that all protections are in place and the service provider has been advised of the required procedures:

- 1) Complete the “NCDVRS Application to Provide Remote Services” along with required attachments (NC DHHS Business Associate Addendum, etc.) and have the sponsoring VR office designee submit using Zixmail or other secure methods to the Assistant Regional Director for their initial review/endorsement and then to the policy office dvr.m.policyoffice@dhhs.nc.gov for review/approval.
- 2) Request will be reviewed and, if approved for the provision of specific service(s) using remote technologies/videoconferencing, a notification will go to the applicant service provider, Assistant Regional Director, and office designee who submitted the request.

The notification will include the expectations for engaging consumers via remote access and will specify the additional required documentation to be included along with provider invoices and reports.

- 3) Approval to provide remote services can be revoked by the Division at any time should there be concerns about service quality, effectiveness of the approach, security, or non-compliance with agency requirements.
- 4) Service providers who have not yet been approved as Division vendor will first need to be approved in BEAM for the specific VR service according to the Division’s vendor approval process currently in place. Once approved as a Division vendor with an activated vendor record in BEAM, this directive should be followed for the provider to be considered for remote service delivery. These processes can be initiated concurrently as appropriate.

Procedures for Remote Service Delivery by Service Providers

Once approved by the Division for delivery of one or more services using remote means, service providers shall use the following procedures:

- Notify the consumer within an adequate timeframe to confirm an appointment with appropriate instructions on how to receive services remotely, encouraging them to participate the best they can to enable their case to progress. Service providers and staff are to clearly identify themselves and their affiliation with the NC Division of Vocational Rehabilitation Services, commonly referred to as “VR.”
- Service providers are expected to notify consumers about the privacy risks to their information while using approved videoconferencing technologies. The following script shall be considered/modified for comprehension as appropriate:

“Dear (consumer name),

Our service provider group has the ability to provide an alternative way to provide services to you on behalf of the Division of Vocational Rehabilitation Service (VR) in light of the COVID-19 pandemic. In order to reach you and provide services, a videoconferencing solution can be used. Please be informed that there is a potential risk to your personal and protected health information when using

remote technologies. However, the Division has taken measures to reduce these risks to the maximum extent possible. Would you like me to proceed with providing you the services recommended by NC Division of Vocational Rehabilitation (VR)? Yes or No”

- The presentation of this statement, method of delivery, and response is to be documented in the resulting service provider’s report.



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MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: December 6, 2021
Re: Interim Policy and Procedure Directive #01-2022: Revisions to Self-Employment Policy

Effective: January 1, 2022

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I. Introduction/General Information

Objectives

The Division supports self-employment as an important employment alternative for eligible clients. The objectives of this policy are: (1) to outline the conditions under which the Division will support self-employment; (2) to provide a clear and disciplined process to evaluate and select clients who have a high probability of succeeding in the small business of their choice; and (3) to provide follow-up and tracking that will both assist the client to succeed long-term and help ensure that Division resources are successfully invested.

To reduce the risks inherent in self-employment for the Division, the processes and procedures required by this policy involve a level of complexity not found in traditional employment. As a result, the client and the Counselor must be prepared to commit to a substantial amount of investigation, analysis, consultation, revision, and evaluation in order to complete this process. This work will take time, and it will not be unusual for this process to take six months or more to complete.

An electronic copy of this policy, all the forms required for its completion, as well as training, reference and resource materials to aid in the process are all located on SharePoint at the following address **under Self-Employment Section**:

[Self-Employment Forms](#) (Use in Chrome or Firefox – Be sure to download and save to your computer)

Division services specifically related to the establishment or restructuring of a small business are subject to Division policies on financial need and comparable benefits relative to the service being provided. Any exceptions to this policy must be approved by the Chief of Policy.

Definitions

- **Business Performance Report** - A VR form that includes a monthly summary of business finances, including income, expenses and owner's draw or salary, as well as comments on profits, losses, progress or obstacles facing the owner in reaching business goals or target income. The form must be submitted by the client monthly to the counselor, with a copy to the Small Business Specialist in the State Office, upon receipt of more than \$2,500 in self-employment assistance from the State Office. This form can also be used by counselors to collect information for cases that fall below \$2,500 in support, but these forms do not need to be sent to the Small business Specialist in the State Policy Office.
- **Business Plan** (Attachment G) – A Business Plan is a written document that reflects the business concept, evidence that there is a need for a product or service and explains in detail how the client is going to implement crucial aspects of the operation. It shows that the client understands who needs the product/service and why customers want the client's product/service, how the client will communicate

and sell to his/her most likely potential customers, shows who the competitors are, how the client can solve customer problems more effectively than his/her competitors, projects sales expectations based on client interviews, conversations, surveys and other research with and about customer prospects, how much the expenses will be, how the client plans to get started and how the client plans to grow in the future. It helps banks, investors, partners and other supporters understand the business idea and gives experts opportunities to ask questions, challenge assumptions versus assertions validated by facts and research, suggest changes in focus, and strengthen the client's chances for sustainability and success. A business plan is not a static document, and it will always need review and revisions by experts and advisors.

- **Client Contribution Worksheet** - NC DVRS has established guidelines for a client's contribution to the business. For any request of support, the client must document that they will provide a minimum matching contribution to the business of 10%, with an increased contribution percentage based on the amount of support requested (see Table 2 of the DVRS Policy Directive). The matching client contribution can include cash from savings, loans, partners or family members, or the value of a vehicle, office space, office equipment, inventory or other assets.
- **Feasibility Evaluation** – A series of evaluations (in the SEEDS process defined below) which identify the market, most likely customers and potential competitors (Market Feasibility), realistic sales and revenue projections (Revenue Feasibility), and potential working capital during start up and ongoing, sustainable profits (Long-Term Feasibility).
- **Fit Evaluation** - A series of evaluations (in the SEEDS process defined below) which evaluate the client's entrepreneurial traits (Personality), vocational and business traits (Vocational), money management skills and ability to provide required matching funds. (Financial).
- **Lean Canvas Business Model** (Attachment M) - A shorter, faster version of a business plan that asks the most critical questions that a more formal Business Plan should include, and every startup needs to answer with evidence and research. A well thought out Lean Canvas can preclude the need for writing a longer, more formal business plan, save time, define the problem being solved by the business, who the best prospective customers are, help the start-up become clearer, targeted and focused on the customer's needs, and help get the business off the ground sooner.
- **Owner's Draw** - A draw is similar to a salary taken out of the business to pay the owner for personal use. There are some accounting differences between a draw and a salary, but the words are often used interchangeably. A draw is sometimes considered a loan taken by the owner from the business and is assumed to be a

debt to be paid back at some point by the owner, unless it is forgiven. Salaries are considered payment for work already done. Sometimes, during slow months, employees who work on a commission take a draw as a loan to be repaid when business gets better in the future. In most uses in VR financial reporting, an owner's draw is considered the same as a salary.

- **Preliminary Business Assessment** - (Attachment A) This is a DVRS form completed by the client which asks some basic, initial questions about the proposed business and the entrepreneur. It is designed to assist the client in articulating the self-employment desires and help the counselor start to estimate whether the amount of support that will be requested is going to be under or more than \$2,500.
- **SBC – Small Business Center** - Small Business Centers are located at each of the 58 community colleges around the state. These centers provide free individual business counseling, classes on entrepreneurship, and local experts, contacts and business networking opportunities. Clients are assigned a business counselor to work with them on fleshing out the business ideas, formulating a business plan and financial projections, and the business counselor can continue helping the entrepreneur after the business opens and into the future. The small business counselors will not write a business plan for the client but will provide valuable advice and assistance in developing the business plan. Find the Small Business Center on your local community college website or at ncsbc.net.
- **SCORE** – Service Corps of Retired Executives - A group of retired and working business executives with a wide variety of industry expertise who volunteer to become a mentor and advisor to someone starting and running a business. Entrepreneurs can request a mentor, watch numerous webinars and find many other excellent business resources online at SCORE.org.
- **SEEDS Evaluation** - SEEDS stands for Self-Employment Evaluation and Direction Setting. This evaluation process will be used to determine whether the Division will support a client's small business goal. The SEEDS evaluation is composed of two major evaluations, a FIT Evaluation and a Feasibility Evaluation. Each Evaluation consists of three areas. All six areas are rated by the counselor to determine whether the client continues on a self-employment track or is re-directed to traditional employment.
- **Self – Employment** - Working for oneself rather than for an employer. Entrepreneurship identifies a problem experienced by enough people to create a solution that can be sold for a profit. Some examples of self-employment are: Barber, Cosmetology, Lawn Care; Specialized Cleaning Services, Farming, Insurance Sales, Baker/Food Service, Video/Music Production; Photographers, Writing Services, Construction Trades and Building/Home Maintenance Services,

Information Technology Services, Home Care, Personal Trainer and work-from-home online business opportunities.

- **The Self- Employment Corrective Action Plan** - The purpose of a Self-Employment Corrective Action Plan (see Attachment C) is to document specific action steps that need to be completed by the client before a final decision on support can be made by the Self-Employment Review Committee. As noted in Table 4, a rating of 3 allows the Self-Employment Client Data Packet to be submitted to the State with a request that a Self-Employment Corrective Action Plan be created to correct the deficiencies. Therefore, any rating of 3 on the SEEDS Rating Form must clearly identify the business deficiency and the recommended steps to correct it.
- **Self – Employment Review Committee** – This committee is responsible for reviewing and approving self-employment plans in excess of \$2500. The Small Business Specialist chairs this committee and works closely with the Chief of Policy and other specialists to make decisions regarding self-employment plans.
- **Supported Self-Employment** - Describes Self-Employment for an individual meeting the criteria to receive Supported Employment Services. These individuals should be able to perform at least one essential function of the business and should have needed supports in place prior to the approval of any support from the division.

Scope and Conditions of Division Support

The scope of the Division's support for self-employment covers the following situations:

- the client is attempting to initiate a new small business venture
- the client is attempting to resume a small business operation that was interrupted due to impediments caused by the client's disabling condition. (Division support will not be available when a client attempts to resume a small business that failed due to economic instability, poor business administration, or other circumstances unrelated to the client's disabling condition.)
- the client is pursuing a model of Supported Self-Employment for which he or she has identified a support team to account for all functions of the business, and in which the client is performing at least one essential function of the business. This type of operation will only be considered for individuals who are classified as MSD (Most Significantly Disabled) and who require supported employment.

The Division shall not provide support for any proposed self-employment venture that:

- has the Division as its only funding source
- is a not-for-profit organization

- is classified as a corporation, except for Single Member Limited Liability Companies which are allowed
- violates state, federal or local laws or regulations
- represents a hobby rather than a competitive and sustainable business venture
- is highly speculative in nature
- is a network or pyramid marketing business in which a portion of the earnings are based on the recruitment of downline representatives
- is already in full operation and consistent with the client's job goal (this does not preclude the Division from providing rehabilitation services related to job retention or job re-entry for persons already self-employed, but does limit the Division from providing support intended to maximize the earnings or productivity of the business for reasons not related to the individual's disability)
- presents a conflict of interest for the Division (e.g., funding a family business in which a family member of the client is a Division employee, or involvement in ventures which would inhibit the Division from effectively carrying out its mission)

Conditions Required for Business Support

The minimal requirements for a business to be considered for support by the Division are:

- client must be 18 years or older
- business owner must agree to become fully compliant with all federal, state and local laws; possess all applicable licenses and permits; and fulfill all tax obligations
- client must represent a minimum of 51% ownership in the business venture at the time the proposal is submitted and throughout the investment period; AND
- client must invest resources in the business as shown in Table 2

Scope of Allowable Purchases

The Division may consider support for goods and services that are required to assist the client in achieving a successful self-employment outcome. If the business proposal is approved (see Section II), the Division may consider the most cost-effective solution for the items described on the business proposal Purchase List (Attachment H). All purchases, whether rehabilitative or not, are subject to specific purchasing policies addressed elsewhere in Volume I.

Purchase List line item requests that will be considered:

- equipment, inventory and supplies
- expenses related to professional services
- up to six months of business rent, insurance, utilities, etc.
- home or office up fit (in addition to home or workplace modifications) which comply with Section 504 of the Rehabilitation Act, ADA Accessibility Guidelines and NC Accessibility Codes
- funds for licensure, certification and related start-up costs
- online business needs including web site design, search engine optimization, online sales tools and social marketing

Purchase List line item requests that will not be considered:

- franchise fees or expenses unique to a franchised operation
- guns, ammunition or explosives
- purchases of “good will” or an intangible saleable asset associated with the reputation of a business and its relationships with its customers
- refinancing or offset of existing debt or tax liability
- purchases of less than commercial grade equipment when commercial grade alternatives are available
- purchase of any real estate, land or structures
- costs to renovate or to correct structural or utility deficiencies on leased properties
- working capital, reserves or funding for salaries or wages
- automobiles, motorcycles, trucks, boats or aircraft

Community Self-Employment Resources for Training, Counseling and Mentoring

It is the intent of the Division to support clients with appropriate training, counseling and mentoring from community-based business and entrepreneurship resources. This support can come in various forms, such as training clients on how to write business plans, counseling clients on specific technical needs, or mentoring clients to ensure the success of their ongoing operations.

The primary local resource for business counseling and training is the Small Business Center (SBC) in each of the community colleges throughout the state. The SBCs

provide free individual business counselors and sponsor classes that include entrepreneurial skills, writing business plans, small business start-up, and small business management. Counseling and mentoring, including assistance in completing a Lean Canvas Business Model or writing a full-scale Business Plan, can be provided by the SBC, Small Business and Technology Development Center (SBTDC), a local SCORE volunteer or from another entrepreneurship or business support organization. See the Self-Employment section of the Casework Forms Page on SharePoint for a list of resources.

Division staff will network with small business support professionals across the state to improve access to these and other organizations for our clients. The DVRS Small Business Advisory Committee will assist the Division in aligning resources across the state to support our clients and to assist in proposal evaluation and problem solving. If additional resources are needed, the Counselor should contact the Division’s Small Business Specialist.

Division Investment and Client Contribution

Client Contribution Worksheet

The Self-Employment Client Data Packet must include a Client Contribution Worksheet (see Attachment J), which is an itemized list of the investment contribution that the client will be making to meet the requirement in the section of **Scope and Conditions of Support.(Page 1)** The resources invested by the client to reach the required percentage can include money for initial operating expenses from savings, loans, partners or family members; or office space, office equipment, tools or equipment, inventory, or other assets. Each investment must be itemized on the form. The value of non-monetary assets will be calculated as follows:

Table 1: Estimating Client Contributions for Self-Employment

Category	Method of Estimating Value
New equipment, tools, etc.	Purchase price
Used equipment, tools, etc.	Estimated fair market price
Home office space	Calculation used by IRS
Other items	Estimated fair market price
Vehicle	Kelly Blue Book

At the time of submission of the Self-Employment Client Data Packet, the total contribution on the Worksheet must equal or exceed the required amount stipulated in Table 1. The actual purchase or allocation of client resources to the business does not have to begin until the Self-Employment Client Data Packet is approved by the Division. Once the approval is given, the client must begin contributing the items listed under the Client Contribution Agreement section of the Self-Employment Agreement (Attachment K).

To ensure that the client has the ongoing support required for successful operations and can sustain the business post-closure, the Division has established guidelines for a client's contribution to the business. Table 2 shows the percentage that must be invested by the client for the Division to provide different levels of support. For any request of support, the client must document that he or she will contribute a minimum of 10% (e.g., if a client requests \$1,000, the client must provide additional resources totaling a minimum of \$100). The contribution percentage increases based on the amount of the Division's investment as shown in Table2.

The resources invested by the client to reach the required percentages can include money from savings, loans, partners or family members; or office space, office equipment, inventory and other assets. The client's contribution will be listed on the Client Contribution Worksheet (Attachment J) and is part of the Self-Employment Agreement (Attachment K).

If the client needs additional funding from outside sources, the Division may elect to take a secondary lien (subordinated) position on purchased items to help clients secure debt financing from a vendor, bank or other lending institution. Loans to support the small business will count as part of the client contribution. Additional funding requested by the client after the Division's initial investment is subject to the contribution requirements and maximums.

The Division's maximum contribution applies to the life of the case. This maximum and the matching requirement do not apply to expenses assumed by the Division which are related to the individual's disability (i.e., workplace modifications or adaptive equipment). Other policies specific to rehabilitation services are still applicable, however. Exceptions to the Division's maximum investment must be approved by the Chief of Policy.

The level of investment by the Division also determines the investment term, which is the length of time that the Self-Employment Agreement is in effect (see Section II). The investment term is set by either the point of successful case closure or the timeframe in Table2, whichever comes last.

Table 2: Levels of Division Investment and Client Contribution

Client Contribution	Division Maximum Investment	Investment Term
More than 50% of requested funds	\$20,000 - \$50,000	5+ years
More than 30% of requested funds	\$10,000 - \$19,999	3-5 years
More than 25% of requested funds	\$2,500 - \$9,999	2-3 years
10% of requested funds	\$1 - \$2,499	1 year

II. Procedures for Seeking Approval

Regardless of the level of support requested of the agency, the counselor should follow these steps:

1. Client expresses interest in Self-Employment and submits a Preliminary Business Assessment (PBA) to the counselor.
2. The Counselor works with the client through guidance and counseling to determine if self-employment is an appropriate job goal. This should include a thorough review and discussion about the policy and procedures required for self-employment.
3. If Counselor and Client agree that self-employment is a reasonable job goal, then the Counselor reviews the PBA to assure all questions have been fully answered and works with the client to fill in any gaps in information.
4. Once the client expresses understanding of the policy/procedures, and remains committed to the process, the counselor should submit the PBA to the Small Business Specialist via dvr.m.selfemploymentcommittee@dhhs.nc.gov to initiate consultation of the proposed self-employment endeavor.
5. The Small Business Specialist will review the PBA in conjunction with the Self-Employment Review Committee and offer guidance to the counselor regarding next steps. These steps may include, but are not limited to:
 - Consultation with the Small Business Center at the local community college and/or a SCORE Representative.
 - Creation of a Lean Canvas Business Model (Attachment M) and/or Business Plan (Attachment G) with financial projections for review/feedback and revisions as recommended by the Small Business Specialist and/or other experts and advisors. A comprehensive Business Plan may be required in addition to the Lean Canvas Business Model at the discretion of the Small Business Specialist.
 - Response to questions/considerations of the Small Business Specialist directed to assist the client in narrowing the focus and/or creating the best opportunity for success.
 - Response to questions/considerations raised by the Self-employment Review Committee that raise concerns regarding disability or other suitability issues.
 - Meeting with Small Business Specialist, counselor and client if needed.

Any significant policy or other concerns brought forth will be addressed prior to moving to the next step.

*Determination of the need for both a Lean Canvas Business Model and a full Business Plan will be based on the anticipated agency investment and over all complexity of the Self-Employment venture.

6. The counselor and the client determine the approximate amount of agency investment requested. The counselor and client should think in terms of the minimum amount needed to start up the proposed business venture.
7. Based on the determination of this amount, the counselor should follow the steps as outlined below based on the expected request for agency investment.

Under \$2500

1. Client submits a Lean Canvas Business Model
2. Counselor reviews/evaluates the Lean Business Canvas Model
3. Once the Counselor feels all questions/gaps have been addressed and is comfortable moving forward, submit the request to the Unit Manager for Approval. The SEEDS Evaluation is not required for business plans below \$2500.
4. Counselor can proceed with implementing services in support of a small business where expenditures are expected to be below \$2500 upon Unit Manager Approval. The approval decision at the unit level must abide by the policies outlined in the Scope and Conditions of Support section as well as the Successful Self-Employment Outcome sections of this policy directive. Consult with the Small Business Specialist as needed throughout the process.

\$2500 and Above

1. Submit a Lean Canvas Business Model for review. A Business plan **may** be required at the discretion of the Self-Employment Review Committee/Small Business Specialist based on the level of investment and nature of the proposed Small Business endeavor.
2. Once a Lean Canvas Business Model has been reviewed and accepted by the Small Business Specialist and the Self-Employment Review Committee, the Counselor may proceed with the SEEDS Evaluation. Please refer to section IV SEEDS Ratings for more detailed information of this process. The SEEDS Evaluation should include:
 - Seeds Rating Form (DVR 0603, Attachment B),
 - Psychological evaluation*, (Attachment D)
 - Vocational evaluation, (Attachment E)
 - Credit Report and Score,
 - Personal Financial Statement and Monthly Personal Budget Plan (Attachment F)

The counselor is encouraged to submit these components to dvr.m.selfemploymentcommittee@dhhs.nc.gov as they are completed to ensure the process moves fluidly.

*The Psychological Evaluation may be waived by the Chief of Policy upon the request of the counselor.

3. The Small Business Specialist in conjunction with the Self-Employment Review Committee will review the counselor's SEEDS evaluation and will complete their SEEDS rating.

Once the SEEDS Evaluation has been favorably completed by the Small Business Specialist and the Self-Employment Review Committee, the counselor will be instructed to submit the remaining Client Data Packet to include:

- Cover Letter summarizing the rationale for approval
 - Financial Needs Survey and supporting financial documentation
 - Pertinent medical and/or psychiatric/psychological evaluations beyond the psychological evaluation completed in step 2.
 - Financial Projections (see Financial Projections Excel Spread sheet template)
 - Site Visit Evaluation conducted by the counselor and rehabilitation engineer if requested by the Self-Employment Committee
 - Division Purchasing Information, including the Purchase List (DVR 0607, Attachment H) and the Special Requirements for Items on the Purchase List (Attachment I)
 - Client Contribution Worksheet (DVR 0609, Attachment J)
 - Letters of Commitment (for Supported Self-Employment proposals only)
4. The Self-Employment Review Committee will send a letter of approval/denial to the counselor.
 5. The Chief of Policy shall issue the Self-Employment Agreement (Attachment K) which must be signed by both the Counselor and the client (and additional business partners as appropriate). The Self-Employment Agreement lists the agreements made by the Division and the client and the obligations of each. It includes the responsibilities of the client prior to the purchase of goods - such as acquiring necessary licenses, permits, and insurance - along with obligations up to and beyond case closure. The Investment Agreement in Section E includes the Division's Security Agreement which outlines the client's obligations to the Division for the items purchased. Section E also requires the filing of a UCC-1 for all items over \$10,000, which will be done by the State Office. The Self-Employment Agreement must be signed by the client prior to the Division purchasing any services/goods. Any violation of the Self-Employment Agreement may result in the Division reclaiming any or all funds distributed to the client in the form of repossessed materials and/or returned monies.
 6. If approved, the Small Business Specialist will coordinate a conference call with the counselor, purchasing office and relevant members of the Self Employment Review Committee to determine purchasing procedures for the items to be purchased by the division.

III. Purchasing Procedures

The counselor should complete the following steps regardless of the amount of the purchase:

- Assist the client in developing a Purchase List (Attachment H) of items/services taken from the Start Up Expense section of the Lean Canvas Business Model and/or Business Plan Financial Projections.
- For Tools and Equipment, be sure to include:
 - Quantity
 - Manufacturer's name and part number
 - Specific description
 - Preferred Supplies
 - Status of the vendor within the case management system (e.g., active, not in system, etc.)
 - Ship to location
- Complete the Miscellaneous Items List for the purchase of items such as Professional Services, Licenses and Insurance
- Complete Attachment I (Special Requirements for Items on the Purchase List) when additional information such as the delivery location and schedule, installation, utility requirements or training is needed.
- If a specific brand of equipment is requested, provide a concise justification summary as to why no other functional equivalent equipment or product can be used.
- If a specific vendor is requested, provide a concise justification summary as to why one specific vendor would better serve the client's needs over any other vendor.
- If a sole source vendor is requested, provide a letter from the manufacturer/supplier confirming they are the only manufacturer/supplier that can provide the product.

When the estimated expenditure is under \$2500:

- Purchase of items may be handled at the Unit Office following all policy/procedures as outlined in Vol 1:2-5 for the purchase of equipment including utilization of the State Term Contract as appropriate.
- Consult with the Self-Employment Review Committee for assistance with the appropriate service for the plan and the authorization as appropriate.

When the estimated expenditure is \$2500 and Up:

- Once the Self-Employment Review Committee has issued the approval letter, the Small Business Specialist will arrange a conference call with the counselor, Purchasing Office, and Services Administrator to establish how all purchases will be handled.

- The Purchasing Office will instruct the Counselor as to which purchases may be handled by the Unit Office and which purchases must be handled by the Purchasing Office at the State Office.
- The Counselor should move forward with purchases as directed by the Purchasing Office.
- The Counselor should seek instructions regarding any purchase that is being handled by the Purchasing Office at the State Office.
- Relevant members of the Self-Employment Review Committee will advise as needed regarding service selection of the purchases and facilitate coordination between Purchasing Office and field staff as needed.

IV. The SEEDS Ratings

The SEEDS rating process provides a standardized method to evaluate the readiness of a client to move forward with their small business request. Tables 3A and 3B show the goal of each evaluation, how to gather evidence in each area, and how to evaluate that evidence to assign a SEEDS rating. In addition, the Counselor should gather other relevant information in each area and use their professional judgment when assigning their ratings.

The Counselor should conduct these evaluations in Status 10 for a new case so as to not commit to self-employment as part of an IPE. Once the evaluations have been successfully completed in Status 10, and approval has been obtained to proceed with the self-Employment plan, then the Counselor should develop the IPE with a goal of Self-Employment (or Supported Self-Employment) which must be approved by the Unit Manager. In instances where the plan has already been developed and traditional employment has been explored and determined unobtainable, the Counselor should amend the IPE to add the services needed to carry out the Fit and Feasibility Evaluations. Once the evaluations have been successfully completed and approval granted for the Self-Employment plan, then the Counselor should amend the plan to change the goal to Self-Employment (or Supported Self-Employment) as well as to add services needed to carry out the Self-Employment plan. The amendment must be approved by the Unit Manager.

Using **Table 3A** the Counselor will assign a rating for the client on all three Fit Evaluations. As part of this decision process, the Counselor must determine if the expected employment outcome resulting from self-employment outweighs the risks associated with the investment of the client's and Division's resources and time. If all ratings are 3 or 4 the client is a candidate to begin the Feasibility Evaluation.

If any of the ratings are below 3, the Counselor will determine if there is training, counseling or other support that can correct the problem(s) identified and raise the SEEDS rating. If mitigation is not possible, the Counselor shall assist the client in identifying an alternate employment goal, which may be employment in the desired vocation under the supervision of someone else.

Table 3A: Assigning the SEEDS Rating

Evaluation Component	How to Gather Evidence	How to Assign Numeric Ratings
<p>Personality Fit</p> <p>Objective:</p> <p>To determine if the client has the entrepreneurial traits needed for self-employment</p> <p>A full psychological evaluation is required to complete this step, and assess the client's entrepreneurial abilities and their capacity to start and operate his/her chosen business. The Counselor provides to the psychologist the Psychological Evaluation for Self-Employment - Referral Form included as Attachment D, adding to the standard questions any additional information about the client or the business that would assist in the evaluation.</p> <p>If the client has had a recent psychological evaluation that addresses these concerns, there is no need for an additional one. A request can be made to the Chief of Policy to waive the requirement for a psychological evaluation if the Unit Manager believes the evaluation is not necessary because of the nature of the disability, the presence of other existing data that addresses psychological fit, etc.</p>	<p>Review the Psychological Evaluation and the Vocational Evaluation in addition to Counselor observation making note of these attributes:</p> <ul style="list-style-type: none"> • Passionate about the business • Open to Suggestions and improvements • Shows leadership skills and motivates others • Regularly Communicates • Resilient • Self-Aware • Committed • Competitive • Highly motivated • Reliable • Persistent 	<p>1= Review demonstrates that none of the desirable attributes are present and personality not a good fit for Self-Employment</p> <p>2 = Review demonstrates that only some of the desirable attributes are present. Additionally, these specific behaviors (Please List) indicate that self-employment is not a good fit.</p> <p>3 = Review demonstrates that most of the desirable attributes are present while these specific behaviors (Please List) need to be addressed in an action plan.</p> <p>4 = Review demonstrates that all desirable attributes are present, and personality is compatible with a self-employment job goal.</p>
<p>Vocational Fit</p> <p>Objective:</p> <p>To determine if the client has the vocational and business management skills needed</p> <p>to produce the business' specific product/ service and the business management skills to run the business. The business management skills include knowledge of and experience in finance and accounting, marketing and sales, customer service and planning, along with the appropriate entrepreneurial traits. The Counselor provides to the Vocational Evaluator the Vocational Evaluation for Self-</p>	<p>Review the Vocational Evaluation, work history and counselor observation keeping in mind the impairments in relation to the required job activities. Make note of these desired attributes:</p> <ul style="list-style-type: none"> • Strong Business Support Network • Driven by impact business will have • Sets goals and measures progress • Proactive 	<p>1= Review demonstrates none of the desirable attributes are present and there is a lack of skills, abilities/knowledge that present a barrier to moving forward</p> <p>2 = Review demonstrates that few of the desirable attributes are present and these significant gaps reveal that self-employment is not an appropriate vocational fit</p> <p>3 = Review demonstrates that most of the desirable attributes are present; however, these specific gaps (Please List) need to be addressed in an action plan.</p> <p>4 = Review demonstrates that all the desirable attributes are present, and client is fully able to take on requirements of small business</p>

<p>Employment - Referral Form included as Attachment E, adding to the standard questions any additional information about the client or the business that would assist in the evaluation. Any business counseling, training, rehabilitation, work experience or other activities recommended in the evaluation can be included as part of the IPE.</p>	<ul style="list-style-type: none"> • Extremely knowledgeable about the product or market • Hard worker in the past and present • Has expert business mentors and advisors • Has relevant work experience and education • Actively seeks help and input • Constantly researching and learning • Has taken business and/or technical classes or attended workshops to improve skills 	
<p>Financial Fit</p> <p>Objective:</p> <p>To determine if the client has money management skills and financial support necessary for self-employment.</p> <p>The purpose of this evaluation is twofold: first, to determine if the client has managed his/her finances responsibly in the past, and second, to determine if the client has the financial resources to support the business until it is able to make a profit. This step consists of three elements: the client's credit report and score, his/her Personal Financial Statement Form and Monthly Personal Budget Plan (see Attachment F).</p> <p>To complete the first step, the client will order his/her credit report and score at https://www.annualcreditreport.com/cra/index. The credit report is free and there is a minimal cost for the score, and both can be ordered at this web site from any of the three affiliated credit agencies. This provides DVRS with the information to judge whether or not the client has responsibly managed his/her finances in the past, and whether, if needed, the client could potentially qualify for a bank loan or line of credit.</p>	<p>Review the credit report, personal financial statement and monthly personal budget along with counselor observation for the following desired attributes:</p> <ul style="list-style-type: none"> • Proven Financial Skills • No delinquent accounts • Positive Net Worth and low levels of current liabilities • Can cover ongoing expenses during business startup • Has additional cash to cover unexpected expenses • Has family or friends willing to help financially • Resourceful • Assets that match the required client contribution 	<p>1 = Review demonstrates that none of the attributes are present, and that there are significant problems with negative net worth, monthly deficits and/or chronic bad credit</p> <p>2 = Review demonstrates that only a few of the attributes are present, and that numerous credit, debt or liquidity problems have been identified</p> <p>3 = Review demonstrates that most of the desirable attributes are present, but specific financial improvement (Please List) is needed prior to business startup and should be addressed in an Action Plan</p> <p>4 = Review demonstrates all desirable attributes are present and that client handles finances responsibly and has sufficient resources to cover expenses during the start up</p>

<p>The Personal Financial Statement and Monthly Personal Budget Plan should be filled out by the client and will give the Counselor insight into how he/she currently manages money and what financial resources are available to support the small business. (Note: The level of resources needed to support the business, particularly during start-up, may not be known at this time. Therefore, it may be necessary to revisit and rescore the Financial Fit after the cash flow projection and other financial statements are submitted.)</p> <p>When needed, Counselors will refer clients on SSI or SSDI to a Social Security Benefits Specialist to clarify how self-employment could impact their payments, and how Social Security programs, including the PASS Plan, could benefit their small business.</p>		
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Once the client has been determined through the Fit Evaluation to be a good match for self-employment, then the Counselor needs to determine if the client’s proposed business is feasible. This Feasibility Evaluation may be completed using **Table 3B** as a continuation of the comprehensive assessment in status 10 or may be planned on the IPE and provided as a guidance and counseling service. The Feasibility Evaluation will focus on three critical success factors – Market Feasibility, Revenue Feasibility and Long-term Profit Feasibility – all of which come from sections of a Lean Canvas Business Model or fully written Business Plan.

If the Feasibility ratings are 3 or 4, and, based on the overall SEEDS evaluation, the client and Counselor are committed to moving forward, then the Unit Manager must agree and sign off on the SEEDS Rating Form.

As with the Fit Evaluation, if any of the ratings are below 3, the Counselor will determine if there is training, counseling or other support that can correct the problem(s) identified and raise the SEEDS rating. If mitigation is not possible, the Counselor shall assist the client in identifying an alternate employment goal, which may be employment in the desired vocation under the supervision of someone else.

The result of this evaluation process is a numeric rating from 1-4 for all six SEEDS evaluation areas. These ratings, along with Counselor comments justifying the selection, are input into the SEEDS Rating Form (Attachment B) and submitted to the Small Business Specialist to be included with all other documents previously submitted. After the Self-Employment Review Committee meets to discuss the case, they will

complete the State Office Comments and Final Rating columns of the SEEDS Rating Form.

Table 3B

Evaluation Component	How to Gather Evidence	How to Assign Numeric Ratings
<p>Market Feasibility</p> <p>Objective:</p> <p>To determine s if there is a market and customers for the proposed product or service, and whether the product or service has a competitive advantage for those customers.</p>	<p>Review the Lean Canvas and supporting documentation for the following desired attributes:</p> <ul style="list-style-type: none"> • Understands how business can solve customers’ problems • Can describe target customers in detail • Can clearly state why business is unique and worth buying from • Narrowly focused • Acknowledges and understands competition • Knows how to communicate with different target customer groups • Plans and makes decisions based on proven facts and not assumptions • Has customers lined up before starting • Plans Ahead • Learns from failures or overcoming obstacles • Willing to adjust, but not constantly adjusting • Seeks feedback and communicates with customers and prospective customers 	<p>1 = Review demonstrates that none of the desirable attributes are present, and there is no realistic market identified and/or no competitive advantage</p> <p>2 = Review demonstrates that only a few of the desirable attributes are present. Markets are identified, and advantage mentioned but little data about or understanding of customers and competitors</p> <p>3 = Review demonstrates that most of the desirable attributes are present. Market and competitive advantage identified, but additional data needs to be collected (Please Specify) and should be addressed in an Action Plan</p> <p>4 = Review demonstrates that all desirable attributes are present, and that client has clear advantage in specific market(s)</p>
<p>Revenue Feasibility</p> <p>Objective:</p> <p>To determine that projected sales revenues are based on solid assumptions</p> <p>This asks whether the customers will actually pay money for the product or service, by determining if the projected sales revenue is based on solid assumptions about customer needs, price, volume and advance sales. The Lean Canvas and/or Business Plan should hold the answers to this section.</p>	<p>Review the sales revenue line from the Financial Projections Worksheet for these desirable attributes:</p> <ul style="list-style-type: none"> • Cashflow projections based on research and realistic, detailed income and expense estimates • Sales revenues are calculated using pricing substantiated in the marketing plan • Sales revenue are based on realistic volume estimates from the sales forecast 	<p>1 = Review demonstrates that none of the desirable attributes are present. There is a very weak connection between sales revenue and market; and little understanding by client</p> <p>2 = Review demonstrates that only a few of the desirable attributes are present. There are insufficient facts and data to substantiate pricing and volume numbers</p> <p>3 = Review demonstrates that most of the desirable attributes are present. Cash flow statement provides evidence to support market, pricing and sales assumptions, however some important information is missing (Please Specify) and should be addressed in an Action Plan</p> <p>4 = Review demonstrates that all desirable attributes are present. There is a clear, convincing link</p>

		between market, price and sales forecast assumptions
<p>Long-term Profit Feasibility</p> <p>Objective:</p> <p>To determine if the proposed business can produce the necessary working capital during start-up and the expected profit during ongoing operations.</p>	<p>Review the Financial Projections Worksheet and the Lean Canvas for the following desirable attributes:</p> <ul style="list-style-type: none"> • Understands how business will create revenue and make a profit • Plans ahead • Understands cost of doing business • Expenses are accounted for • Cashflow statement shows positive monthly trend with sufficient buffer for unexpected expenses • Owners' draw or salary meets or exceeds the successful outcome target • There are no clear reasons (i.e., changing regulatory requirements, future market demands, new skills or capabilities required) that the business will not be able to meet long-term profitability 	<p>1 = Review demonstrates that none of the desirable attributes are present. Negative or unrealistic cash flow shows that the business concept will not work. Other significant barriers exist to long-term profitability.</p> <p>2 = Review demonstrate that only a few of the desirable attributes are present. Cash is inadequate to meet start up or profit expectations. Other significant problems exist that will prevent long term profitability</p> <p>3 = Review demonstrates that most of the desirable attributes are present. More investigation is needed in specific areas (Please List) to be confident of long-term profitability and should be addressed in an Action Plan</p> <p>4 = Review demonstrates that all the desirable attributes are present. Cash is more than adequate based on plan and reasonable contingencies. No barriers identified to reaching a successful outcome.</p>

The definitions for each of the four rating levels are given in Table 4 below, along with the actions associated with each.

Table 4: Definition of Ratings/Actions to Be Taken

Rating	Definition	Action
1	Inadequate to proceed with self-employment	Stop small business process and pursue other employment goals
2	Major improvements needed before Self-Employment Client Data Packet can be considered by Self-Employment Review Committee for review	Significant improvements need to be made prior to submitting Self-Employment Client Data Packet to Self-Employment Review Committee. Unit will determine if gaps identified can be closed and decide whether to pursue corrective actions at unit level.

3	Specific, usually minor, deficiencies noted in SEEDS which can be corrected prior to business start up	Rating allows Self-Employment Client Data Packet to be submitted to Self-Employment Review Committee with a request for a Self-Employment Corrective Action Plan to correct deficiencies
4	Fully meets requirements	Rating allows Self-Employment Client Data Packet to be submitted to Self-Employment Review Committee, for consideration for approval.

The Self-Employment Corrective Action Plan

The purpose of a Self-Employment Corrective Action Plan (see Attachment C) is to document specific action steps that need to be completed by the client before a final decision can be made by the Self-Employment Review Committee. As noted in Table 4, a rating of 3 allows the Self-Employment Client Data Packet to be submitted to the Self-Employment Review Committee with a request that a Self-Employment Corrective Action Plan be created to correct the deficiencies. Therefore, any rating of 3 on the SEEDS Rating Form must clearly identify the area’s deficiency and the recommended steps to correct it.

The Self-Employment Review Committee will determine when a Self-Employment Corrective Action Plan will be needed and will work with the Counselor and the client to come up with the action steps and due dates in the plan. The Small Business Specialist will monitor the plan for completion, and the Self-Employment Review Committee will determine if the corrective actions taken are sufficient to move forward with the self - employment process.

Site Visits and Vehicle/Trailer Inspections

During the preparation of the business plan the client may decide on a specific location for the business. If this location is known and can be inspected, the Counselor will arrange a site visit. The purpose of the visit will be to identify any problems or barriers to the successful operation of the business at this location.

The regional Rehabilitation Engineers and the State Office Rehabilitation Technology Specialist are additional resources available to the Counselor. The Rehabilitation Engineers can assist with site reviews if the need for modifications or upfits are anticipated and can also assist as a staff consultant for specialized equipment needs, modifications, and any work that may need to be done to have equipment interface with the building or worksite. The Rehabilitation Technology Specialist is also available to assist with worksite-related assistive technology needs.

When the client provides a vehicle and/or trailer that are necessary for the success of the business, a Rehabilitation Engineer needs to determine whether the equipment is

capable of performing the required business functions. This evaluation includes but is not limited to an assessment of the equipment's condition and capacities.

Evaluating Business Partners and Other Major Supporters

If the client owns at least 51% of the business but less than 100%, OR if the client is pursuing a goal of Supported Self-Employment, then the Counselor may request that the other owner(s) or business support person(s) participate in the SEEDS evaluation. This would be particularly important if the other owners were providing any of the expertise or financial backing being assessed in the Fit Evaluation. Similarly, if a spouse, relative or friend is going to play a significant role in the business, the Counselor may request his/her participation in the SEEDS evaluation. Financial documentation will be required prior to the final approval for any partner owning 10% or more of the business.

For clients pursuing Supported Self-Employment, the completeness, quality and commitment of the business support network will be a major focus in the Feasibility Evaluation. The Business Structure and Organization section of the business plan must include a complete analysis of the support needed by the client to successfully operate the business, including the skills and experience of the support personnel, their reliability and commitment and their ability to function well as a team.

V. Procedures for Tracking/Follow up

Follow up Assistance

After the self-employment plan has been approved and the purchases made, many clients will face new problems during the start-up phase of the business. It is very important to the long-term success of these start-ups for the client to seek regular, ongoing meetings, reviews and advice from business counselors and mentors. Counselors should help connect or re-connect clients, with an SBC, SCORE or other mentor to provide ongoing support.

Pre-Closure Visit

Prior to successful closure, the Counselor shall conduct a site visit to observe the business and to verify proper use of the equipment/supplies/services provided by the Division. If the client fails to follow the terms of the Self-Employment Agreement or fails to cooperate during a site visit prior to case closure, then the Division shall take actions to reclaim those items purchased to support the business.

Business Performance Reporting

Division funded businesses must submit a Business Performance Report (see Attachment L) on a monthly basis as agreed to in the Self Employment Agreement. The purpose of this report is to monitor the health of the start-up business. If significant problems or negative trends are identified, the client should seek help from the SBC, SCORE or another business mentor and the Counselor should ask for help from the State Office.

Closure Requirements

All closure criteria outlined in Volume I, *Section 6-1, Successful Employment Outcome After IPE Completion – Case Status Code 26* apply to small businesses. The progress towards a successful outcome will be monitored through the Business Performance Management process outlined in this section. In addition, closure shall be determined by meeting the requirements in either (1) or (2) below:

1. The client has paid him or herself an owner's draw/salary for a period of time as agreed upon in the Self-Employment Agreement. This amount should equal or exceed a monthly profit target agreed to by the Counselor and the Client and be equal to or exceed minimum wage; however, exceptions to this minimum target can be considered for approval by the Chief of Policy. This profit target is documented in Section G.1. of the Self-Employment Agreement (Attachment K) for proposals over \$2,500 and is documented in the unit approval letter for proposals under \$2,500. Monthly Business Performance Reports (Attachment L) and financial statements can be used to track the owner's draw/salary against the profit target.

OR

2. The client has not met the criteria set forth in (1) above, but the business has generated profits and been in operation for at least 9 months. If during this time the client has chosen to reinvest profits back into the business, or keep them as business savings, and these profits are adequate to support an owner's draw/salary equal to or exceeding the profit target, even if the client chooses not to take an owner's draw/salary within this time period, then the case will be closed successfully.

After 9 months of operation if the business does not meet the criteria in either (1) or (2) above, the case is to be referred to the Small Business Specialist who will devise a plan of action to achieve the results within an additional 4 months of operation. Following this period if the business has not yet met one of these two outcomes, a decision will be made to keep the case open to monitor future operations and to consider other alternatives in consultation with the Chief of Policy and the Small Business Specialist.



MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: **January 24, 2022**
Re: **Interim Policy and Procedure Directive #02-2022: Procedures for Client Interns in VR Field Offices**

Effective: February 1, 2022

Employment First encourages DVRS to set the lead in providing employment opportunities for individuals with disabilities. As part of this initiative there may be opportunities for VR clients to participate in an internship within a VR or IL office. The internship experience must be based on the employment goals and training needs of the client, rather than a need to fill a vacancy within an office. Policy requirements including the time frame for internships and the process required via iLife must be followed. Please refer to Volume I Section 2-20-9 for additional policy requirements.

The following types of positions and training goals have been identified and piloted in DVRS offices. To ensure consistency across the agency, hourly wages for the internship have been established as noted.

1. Office/Administrative Specialist – \$15.00 per hour
 - Answering phone and routing calls to staff
 - Welcoming visitors to office, sign in
 - Purging files
 - Taking referrals (paper form)
 - Distribution of mail
 - Copying/scanning information
 - Assembling packets (e.g. IL bid packets)

2. Human Services Specialist – \$17.00 per hour
 - Contacting clients – appointment reminders
 - Assisting with tracking 60- and 90-day requirements – other caseload management tasks
 - Assisting staff with searching for jobs on identified job sites

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF VOCATIONAL REHABILITATION SERVICES

LOCATION: 805 Ruggles Drive, Haywood Building, Raleigh, NC 27603
MAILING ADDRESS: 2801 Mail Service Center, Raleigh, NC 27699-2801
www.ncdhhs.gov/dvrs • TEL: 919-855-3500 • FAX: 919-733-7968

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

Based on the skills and employment goals of the client, there may be additional positions suitable for an internship. These may include clients with direct service delivery employment goals (job coach, BRR, VR/IL Counselor). These situations should be staffed with the UM and RSES before developing the internship.

When a client is identified as a suitable match for a DVRS Unit Office internship, the counselor must submit the following information to the Chief of Policy for review and approval:

- Narrative explanation regarding why the client is an appropriate candidate for the specific internship and how the internship will meet the client's specific training and rehab needs
- Details of the proposed internship including:
 - Job title (Office Administrative Specialist, Human Service Specialist or other)
 - Description of specific training tasks/job duties to be performed including the location of where tasks will occur (specify in-office or remote)
 - Number of hours per week and duration of internship. The internship cannot exceed more than 504 total hours, 18 weeks and 28 hours per week.
 - Name/Job title of internship supervisor with acknowledgement that the supervisor understands the time commitment required to adequately supervise the intern
 - Specify any equipment, accommodations or AT requirements

Responsibilities of client's counselor

If approval to proceed is given by the Chief of Policy, the counselor of record should follow all standard internship procedures for establishing an internship as noted in Volume I Section 2-20-9 (Internship Agreement, iLife forms). The counselor will submit all timesheets and conduct the evaluations as required by policy.

Responsibilities of Internship Supervisor

The host office internship supervisor is responsible for coordinating and completing all required HR procedures outlined below and ensuring that all required training and onboarding is completed.

The LOA or internship supervisor must inform the client that a Criminal Records Check and Drug and Alcohol Screening are required. The LOA will send the HR Internship Personnel Technician the following information:

- Full Name
- Personal email address
- Telephone number
- Agency start date
- Lead Office Assistant who will complete the DocuSign envelope

HR will be responsible for sending the client the following documents:

- DHHS Criminal Record Check Consent Form and the Criminal Records Check Transmittal Form

- Drug &/or Alcohol Testing Consent Form and the Drug/Alcohol Testing Authorization Form
 - ELECTRONIC FINGERPRINT SUBMISSION RELEASE OF INFORMATION and FINGERPRINT APPLICATION INFORMATION (if applicable). This process is a coordinated effort between the manager/designee, client and Lead Office Assistant (LOA).
- A. LOA will submit the chain of custody form to the HR Internship Personnel Technician.
- B. NCDVRS-HR Internship Personnel Technician will notify the unit office representative (LOA) of the results. Clients can start their placement within 30 days of a favorable outcome. Failure to report within 30 days the process has to be repeated.

When cleared to start by HR, the new hire and computer access forms should be submitted to IT for access to SharePoint, BEAM, email and to secure necessary equipment.

Day 1 of the internship:

- The client must sign the confidentiality agreement and discuss with the intern supervisor the sensitive nature of VR/IL information and the limits of their access of sensitive information
- Training regarding HIPAA, Social Security Access and Equipment Use training must be completed. Training materials are available on SharePoint.

To protect clients' confidentiality, they should not be identified as clients while performing internship duties. They should be viewed as professional/paraprofessional staff and issues arising with regard to a dual relationship should be handled carefully. Staff should seek consultation with management if specific issues occur and further guidance is needed.

- The client's BEAM case record will be password protected for the duration of the internship. The password must be kept secure and not provided to the client
- Under no circumstances will client interns have access to their hard copy file. It must be secured in a locked file cabinet not accessible to the client.
- Clients should only be placed in an internship in the office where they are served after all other reasonable options are considered. **Under no circumstances shall the counselor of record be the internship supervisor.**
- At no time should a client intern be the only staff in the office.
- Clients should not be given keys to the office or file room.

COVID Requirements

All current COVID requirements for staff are applicable for client interns. This includes wearing face coverings while conducting business and maintaining social distancing requirements. Additionally, client interns must provide proof of vaccination or submit to weekly COVID testing. Since they will not have access to the portal, this information must be emailed directly to the DVRS Human Resource Manager as required. All COVID related requirements should be discussed with the client at the time of the initial internship discussion. Failure to adhere to these requirements will result in termination of the internship.



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KATHIE B. TROTTER, MS, CRC, LCMHC, CPM • Director

MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: **March 30, 2022**
Re: **Interim Policy and Procedure Directive #04-2022: In-Person Services and COVID-19**

Effective: April 1, 2022

The COVID-19 pandemic necessitated limited face to face interaction during the last two years to reduce transmission of the virus. Despite challenges in providing services remotely, DVRS staff have continued to assist individuals with disabilities with reaching their employment and independent living goals.

Governor Cooper, through Executive Orders, has adjusted mask mandates and other social distancing requirements through the course of the pandemic based on shifting COVID-19 metrics. At the present time the indoor mask mandate has been lifted, while social distancing and hand washing practices are still emphasized to reduce the transmission of COVID-19. As a result of the reduced restrictions, staff are encouraged to engage clients in face-to-face interactions when service delivery is optimized by in-person services and when specifically requested by clients. This includes seeing clients in VR and IL offices, schools, and other community settings, and in clients' homes.

Staff should be sensitive to clients' comfort level for receiving in-person services. Although masks are not required, staff are encouraged to wear masks when requested by clients during face-to-face visits. Clients must not be required to wear a mask as a condition for receiving in-person services from VR or IL.

Written consent to provide in-person services is no longer required. The client should agree with the method of service delivery, and Services should not be delayed, denied, or otherwise restricted by a client's preference to receive services in person versus remotely. Any questions about providing in-person services should be directed to the supervisor.

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KATHIE B. SMITH, MS, CRC, LCMHC, CPM • Director

MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: February 22, 2024
Re: Interim Policy and Procedure Directive #02-2024: Benefits Counseling Services for SSI/SSDI Beneficiaries

Effective: March 1, 2024

Cross reference Chapter 4 VR Comprehensive Assessment and IPE Development

Benefits Counseling services are available to SSI/SSDI beneficiaries to provide accurate information about the impact of earned income on current benefits as well as Social Security work incentives and other programs. Benefits Counseling can help a beneficiary make an informed choice about work and understand work incentives that may be available.

The Ticket to Work and Work Incentives Improvement Act of 1999 authorized Social Security to expand the utilization of community-based Benefits Counseling (Work Incentives Planning and Assistance (WIPA) to SSI/SSDI recipients. Currently, North Carolina has two federally funded WIPA programs that are administered by NC DVRS and Employment Source, Inc., each serving a specific area of the state. WIPA regulations target Benefits Counseling service provision to high priority individuals. High priority recipients include interested beneficiaries who are actively working or engaging in self-employment, those who are actively seeking employment or self-employment, veterans, or anyone ages 14-25, even if they are not actively pursuing work.

Through WIPA, high priority beneficiaries will receive intensive, individualized benefits counseling to include an assessment and detailed report. Lower priority will receive basic information regarding the potential impact of earned benefits on SSI/SSDI benefits and work incentives. Refer to <https://www.ssa.gov/redbook/eng/resources-supports.htm> for additional information regarding Work Incentive Planning and Assistance (WIPA) and other resources. The Red Book is a general reference tool designed to provide a working knowledge of work incentives.

DVRS recognizes the value of benefits counseling to all recipients of SSI/SSDI. Therefore, as a result of an ongoing unmet need statewide for broader access to benefits counseling, NCDVRS has established a service entitled Benefits Counseling - Fee for Service to sponsor benefits counseling to SSI/SSDI beneficiaries requiring this service when individualized benefits counseling is not available through WIPA because they do not meet the high priority target or are unable to receive the service within a reasonable time period. Prior to sponsoring this

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service counselors should explore if the client's needs can be met with the Ticket to Work Helpline number 1-866-968-7842 or 1-866-833-2967 (TTY). If not, and the client meets high priority for WIPA, the VR counselor should contact the WIPA counselor serving their office to obtain a timeframe to address the referral for benefits counseling. If the benefits counselor is able to address the referral within 14 days, a referral should be initiated to the WIPA Benefits Counselor. If there is a delay in benefits counseling due to availability, then a fee for service Benefits Counseling referral can be considered.

Established rates for this service are located in Volume V. This service is not subject to financial need, but comparable benefits should be used when available.

Benefits Counseling - Fee for Service:

Specific Benefits Counseling services within the scope of this VR funded service include:

Information and Referral (I&R): I&R consultations should provide information to answer simple or generic questions about benefits or work supports. It can also introduce the discussion of basically how work affects benefits. Generally, individuals should be able to receive this information in one or two brief sessions. VR Counselors should receive a basic summary of what information was discussed in these sessions from the benefits counselor.

Benefits Summary and Analysis: Involves more intensive and ongoing direct assistance to a beneficiary in the development of a comprehensive assessment of how a specific job and earnings will affect all benefits received. This assessment will result in the creation of a Benefits Summary and Analysis report, which will require ongoing monitoring to determine if any revision to the report is needed due to changes in employment (raises, changes in hours worked, loss of employment, etc.) Included in this assessment report are recommendations to the effective use of work incentives, which are special rules that make it possible for people with disabilities receiving Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI) to work and still receive monthly payments and Medicare or Medicaid. Although ongoing, follow up should be intermittent or on an as needed basis.

The VR Counselor or designee will issue an authorization to approved vendors for the specific category as noted above. The following should be used to determine the total amount of the authorization:

Information and referral	Not to exceed 3 hours (\$120)
Benefits Summary and Analysis	Not to exceed 5 hours (\$200)

The vendor will provide the service as requested and submit a report and invoice to the VR Counselor who will approve the payment through Encore. The invoice must contain the specific number of hours provided.



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MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: February 22, 2024
Re: Interim Policy and Procedure Directive #03-2024: Individual Placement and Support (IPS) Service Policy

Effective: March 1, 2024

Cross Reference: SD/MSD Policy, Volume 1: Section 3-6-13

Definition

Individual Placement and Support (IPS) is a person-centered, behavioral health service with a focus on employment, that provides assistance in choosing, acquiring, and maintaining competitive integrated employment in the community for individuals 16 years and older with Severe and Persistent Mental Illness/Severe Mental Illness (SPMI/SMI) for whom employment has not been achieved or employment has been interrupted or intermittent. Research demonstrates that individuals who obtain competitive integrated employment through IPS services have increased income, improved self-esteem, improved quality of life, reduced symptoms, and reduced mental health utilization. A supporting principle of IPS is the integration of mental health services and rehabilitation. The IPS team includes a team lead, employment support professional (ESP), employment peer mentor (EPM), and a benefits counselor. The IPS team collaborates closely with the behavioral health partner to incorporate interventions that foster recovery. The VR Counselor serves an integral role in the delivery of IPS services through expert career counseling and guidance, disability expertise, and additional employment supports.

While DVRS supports several models of supported employment, IPS refers to an evidenced based practice of supported employment. (<https://www.westat.com/insights/individual-placement-and-support-aiding-mental-health-recovery-through-work/>). According to the IPS model, employment is viewed as an essential part of recovery. Individuals with severe mental illness and severe and persistent mental illness want to work, but only 15% are employed.

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The IPS model follows 8 practice principles that support full adherence to the model. These principles are as follows:

1. **Competitive Employment:** These are jobs that anyone can apply for, that pay at least minimum wage or the same pay as coworkers with similar job duties and have no artificial time limits imposed by the social service agency.
2. **Systematic job search:** Employment specialists systematically visit employers who are identified by the job seeker to learn about their business needs and hiring preferences.
3. **Rapid Job Search:** The job search begins 30 days after the individual expresses an interest in going to work. Employment specialists focus on obtaining employment without the reliance on assessments, training, or counseling.
4. **Integrated Services:** IPS programs are integrated with mental health treatment teams. Employment specialists are coordinating with 1 or 2 mental health treatments teams on individuals they are serving and also individuals that would benefit from IPS.
5. **Benefits Planning:** IPS Benefits Counselors help people obtain personalized, understandable, and accurate information about their Social Security, Medicaid, or other government entitlements.
6. **Zero Exclusion:** People are not excluded on the basis of readiness, diagnoses, symptoms, substance use history, level of disability, or legal system involvement.
7. **Time Unlimited Supports:** Job Supports are individualized and continue for as long as the individual wants and needs the support. Employment Specialist have face-to-face contacts at least monthly.
8. **Worker Preference:** Services are based on the job seekers preferences and choices rather than the employment specialist's and supervisor's judgements.

IPS Team

IPS Team Lead: Oversees the operation of the program or team to support high fidelity program implementation and drives the delivery of the service. Other duties of the team lead can include and are not limited to the following:

- Provide oversight of employment services and collaborates with behavioral health supports.
- Supervises staff to ensure the delivery of evidenced-based and ethical practices.
- Provides weekly outcome-based supervision and monthly field mentoring with each member of the team.
- Collaborates with DVRS to discuss referrals and problem solve barriers.
- Directly provides IPS services, maintaining a caseload of no more than nine IPS recipients.
- Provides psychiatric rehabilitation interventions that support employment and educational goals.
- Ensures the integration of IPS with other mental health services.
- Uses assertive engagement strategies to continuously engage IPS recipients in IPS services.

Employment Support Professional (ESP): Directly provides and engages individuals in IPS services. Additional supports of the ESP can include and are not limited to the following:

- Promotes self-determination, recovery, self-advocacy, and self-direction.
- Uses assertive engagement strategies to engage individuals into the IPS service and promotes employment.
- Assists in identifying strengths, wellness goals, setting objectives, and identifying barriers to service delivery,
- Explore career and educational goals.
- Develop the Career Profile and continues to monitor the ongoing needs and revisions of this document.
- Collaborates with EPM, DVRS, behavioral health providers, families, natural supports, Tailored Care Management (TCM or Care Coordination provider and others that support the individuals they support.
- Case management but should not exceed five percent of their overall duties.
- Develops relationship with employers by learning about their business, hiring practices, employment needs, and business priorities over multiple in person visits that will meet the IPS recipients' employment goals.
- Provides psychiatric rehabilitation interventions that support employment and education goals.

Employment Peer Mentor (EPM): Has lived experience in recovery from mental health and/or substance use. Supports provided by the EPM can include and are not limited to the following:

- Identifying and learning available community resources and teaching wellness management strategies.
- Assists in identifying strengths, wellness goals, setting objectives, and identifying barriers.
- Assists in continued vocational assessment and employment goal planning and participates in the development of the career profile.
- Development of a wellness recovery plan (WRAP), Illness Management and Recovery (IMR), and other plans to support employment.
- Supports informed decisions about employment.
- Provides psychiatric rehabilitation interventions that support employment and educational goals, and other support directly related to employment goals.

Benefits Counselor: Provides counseling and guidance to individuals regarding the impact of earned income on current benefits. Supports provided by the Benefits Counselor can include, but are not limited to the following:

- Creates a written Work Incentive Benefits Analysis or amends a written Work Incentive Benefit Analysis in the event of changes to income.
- Provides support in accessing work incentives, (1916b) subsidies, impairment related work expenses (IRWE), and plan to achieve self-support (PASS).
- Supports the development of a plan to maximize earning potential, report earning, and navigating the benefits system.
- Provides a report explaining the results of the work incentive benefits analysis, including any changes to benefits.

Target Population

- A. The following criteria must be met for consideration of IPS Services. The individual must be at least 16 years of age.
- B. The individual has one or a combination of the following diagnoses:
 1. Serious Mental Illness (SMI).
 2. Severe and Persistent Mental Illness (SPMI).
 3. Serious Emotional Disturbance (SED).
 4. Substance Use Disorder (SUD) Severe as defined by the DSM-5 or any subsequent version.

AND

- C. Expresses the desire to work.
- D. Demonstrates at least one or more of the following:
 1. Established pattern of unemployment, underemployment, or sporadic employment;
or
 2. Educational goals that related to employment goals; and
- E. Needs assistance in obtaining or maintaining employment in addition to what is typically available from the employer because of functional limitations as described above and behaviors associated with the SMI, SPMI, SED, or severe SUD.

VR Policy does match the State and Medicaid service definitions for IPS. Policies are referenced below:

- [NC DHHS Medicaid Service Definition IPS](#)
- [NC DHHS State Service Definition IPS](#)

The intended targeted population for IPS services is VR eligible individuals classified Most Significantly Disabled (MSD). The VR Counselor is required to consider functional capacity areas broadly and gather information from the IPS Team and individual that may assist in determining hidden factors that warrant the need for ongoing, unlimited wrap around support. **In rare instances, an individual may not meet the MSD criteria but will benefit from the wrap around supports offered by this model of employment.** Consultation with the Program Specialist for Behavioral Health is recommended if there are questions regarding the appropriateness of providing IPS services to a client classified as Significantly Disabled (SD). Under no circumstances will a client classified as non-SD be considered for IPS services.

IPS Funding

To promote sustainability of the model, IPS uses sequential funding to cover the cost of the service. This can be categorized as funding that comes from both the State and Medicaid in addition to VR Milestones known as NC CORE. At the initiation of services IPS providers are required to refer IPS recipients to DVRS for eligibility determination and development of services through the IPE.

- **Funded by the LME/MCO:**

Engagement and Informed Decision: EPM, ESP, and/or Team Lead provides in person assertive engagement/motivational interviewing to define the individual's goals, interests, and strengths. During this time the team is exploring the individual's interest in education or employment and providing information about the IPS program to allow an informed decision to enroll in the service.

Career Profile: A detailed vocational assessment in which the Employment Support Professional (ESP) records job preferences, work history, education history, strengths, legal history, job search planning, job support planning, and other information pertinent to a person's employment or education goals. This information is gathered through interviews with the consumer, therapist, and family members. This assessment is ongoing and is continuously updated throughout the delivery of the service.

Long Term Job Retention: Time unlimited supports are continued follow along supports that are provided by the ESP, EPM, and natural supports once the individual has reached their 90th day of successful employment after vocational recovery has been achieved.

Supported Education: The IPS Team, including the VR Counselor, may provide support such as assistance in researching training options, establishing learning accommodations, investigating financial aid, and assisting with the development of effective study habits. The VR Counselor may consider funding the training if it is related to the vocational goal. This can be provided simultaneously with employment services when training is a viable option and would enhance employability. If VR is funding the education program, if appropriate, VR can fund the job development and vocational support milestones. Once education has been completed and that individual is ready to seek employment in the vocational field the individual IPS job development and vocational recovery milestones can be repeated.

Behavioral Health Interventions: Interventions provided by outside therapists, nurses, case managers, stand-alone peer mentors, Community Support Teams (CST), Tenancy Management Services (TMS), psychosocial rehabilitation, psychiatrists, substance use treatment, or other behavioral health service to enhance success at work.

- **Funded by Vocational Rehabilitation**

Job Development and Retention: A systematic approach to job development very similar to NCDVR dual customer approach. Includes (3) three days of documented supports after employment has been secured. Job Supports do not have to be on or after the first day of employment.

Job Support and Vocational Recovery: Job Support begins once the 3 days of documented job support have been provided. Job Supports can be provided on or offsite given the client's preference. These services may involve development of stress management techniques to be used at home or on the job, organization of activities of daily living to ensure a smooth transition to work, or other non-traditional activities to promote success at work. IPS Job Supports lasts at a minimum 30 days, but this time frame is dependent on individual need and ends when both the VR Counselor and IPS team agree that stability has been achieved. Vocational Recovery begins the following

day and begins the provision of follow along supports. The 90-day employment count begins the day after the agreed upon vocational recovery date and follow along supports have been initiated.

90 Day Placement: After the vocational recovery has been achieved for the IPE goal, follow along will continue for 90 days leading to successful milestone completion and case closure.

Peer Support and Benefits Counseling are provided throughout IPS and are included in all milestone rates.

IPS Best Practices:

Referrals

It is expected that most referrals for IPS come directly from the IPS provider as part of the NC CORE payment structure. These referrals will include medical documentation supporting the SMI/SPMI and/or SUD Severe diagnosis and other information supporting functional limitations that will assist the VR Counselor with eligibility determination. It is not appropriate to specifically require medication and therapy requirements as contingencies for services since these issues will be addressed through the provision of IPS service.

VR Counselors are strongly encouraged to consider IPS for individuals with a documented SPMI/SMI, dual diagnosis of SMI/SPMI and SUD, or SUD Severe. Research shows that individuals in these disability groups benefit most from the intensive wrap around services provided by an IPS provider. It is recommended to discuss these potential referrals to the IPS team to ensure criteria is met for support by the LME/MCO in addition to VR funding.

Eligibility

The IPS model is based on the concept of rapid engagement and job search. Therefore, VR Counselors are expected to move rapidly from referral to IPE development to meet the fidelity of the IPS model. This can include working directly with the IPS provider and client on information pertaining to functional limitations, scheduling intakes or other appointments required by the VRC, or other barriers that are experienced with the connecting the individual with VR Services.

Individualized Plan for Employment

IPS is considered an employment service that includes integration with the individual's behavioral health provider. If behavioral health services are provided by an external organization, it is the responsibility of the IPS provider to engage this entity. Make a note of it in the service detail section of the IPS service on the IPE. Client responsibilities should address the need to maintain close communication with all members of the IPS team and to be an active participant in the delivery of services. It is not appropriate to specifically require medication and therapy requirements as contingencies for services since these issues will be addressed through the provision of IPS service.

When adding IPS to the IPE, the VR counselor should add a statement in the counselor comment section addressing the ongoing, time unlimited supports provided after the successful completion of Milestone 3 90 Day Placement and case closure. This support typically lasts a year, although a client may choose to end these services before receiving them for a year.

Benefits Counseling

Clients that receive benefits (e.g. Medicaid, SSI and/or SSDI, food stamps, housing subsidies, Veteran's benefits etc.) and receiving IPS should also be offered or receive ongoing benefits counseling by the IPS team. The VR Counselor does not need to make a referral to a VR benefits counselor but mentions in the service description that benefits counseling is included in the IPS service. In a case when an IPS team does have a vacancy in this position the VR Counselor can make a referral internally to a WIP or fee for service benefits counselor. It should be assumed that if this position is filled that the client will continue with the IPS team's benefits counselor. IPS team benefits counselors can consult with an internal VR benefits counselor. In those cases, the VRC does not need to make an internal referral for benefits counseling.



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MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: **October 23, 2024**
Re: **Interim Policy and Procedure Directive #04-2024: Community Inclusion**

Effective: October 23, 2024

Community Inclusion

Individuals with significant disabilities may require additional supports during recovery from a designated State of Emergency. This Policy Directive pertains to clients impacted by Hurricane Helene. These Community Inclusion services are effective immediately to ensure clients maintain engagement in employment services and have access to emergency resources to maintain safety and health, and emotional and physical well-being.

Community Rehabilitation Programs (CRPs) are uniquely designed to deliver these additional supports to our clients who require Work Adjustment Services, Supported Employment, Individual Placement and Support Services or Brain Injury Support Services during hurricane recovery. Community Inclusion includes services in the areas of Job Preparedness, Independent Living, Disability Awareness, and Emergency Resource Access. The VR counselor, client, and CRP should discuss the benefits of this service, connect it to a specific rehabilitation need, and jointly agree on broad subject areas.

Services must be delivered individually and in a such a way that the VR client can benefit in terms of an employment outcome. The provider can use professional expertise to provide the service, develop curriculum, use online virtual learning, or purchase existing materials to provide the service. Remote service delivery using electronic platforms with proven security measures as well as in-person service delivery are acceptable.

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COMMUNITY INCLUSION CHECKLIST

Client Name/State ID#:

Provider: _____

Job Preparedness	Disability Awareness	Emergency Resource Access	Independent Living
<input type="checkbox"/> Resumé Development	<input type="checkbox"/> ADA	<input type="checkbox"/> Coping with stress and trauma	<input type="checkbox"/> Social Security Benefits and Work
<input type="checkbox"/> How to conduct a virtual interview	<input type="checkbox"/> Olmstead Act	<input type="checkbox"/> Accessing supports for housing, food, clothing, transportation and other emergency aid	<input type="checkbox"/> Financial Literacy
<input type="checkbox"/> Time Management	<input type="checkbox"/> WIOA, Section 504	<input type="checkbox"/> Replacing lost documents required for employment	<input type="checkbox"/> Banking
<input type="checkbox"/> Is a Job Fair right for me?	<input type="checkbox"/> Self-Advocacy	<input type="checkbox"/> Accessing mental health services	<input type="checkbox"/> ABLE Accounts
<input type="checkbox"/> Dress for Success	<input type="checkbox"/> Navigating Disability Resources	<input type="checkbox"/> Accessing physical health services	<input type="checkbox"/> Explore higher education opportunities
<input type="checkbox"/> Coping with Stress at work	<input type="checkbox"/> Accessibility	<input type="checkbox"/> Re-establishing communication (phone, email, internet)	<input type="checkbox"/> Other: _____
<input type="checkbox"/> What are benefits?	<input type="checkbox"/> Accommodations	<input type="checkbox"/> Volunteerism	
<input type="checkbox"/> What does my pay stub mean?	<input type="checkbox"/> Guardianship	<input type="checkbox"/> Is my place of employment open for business? Do I still have a job?	
<input type="checkbox"/> What is unemployment insurance?	<input type="checkbox"/> Other _____	<input type="checkbox"/> Resources for emergency information in the community	
<input type="checkbox"/> Benefits Counseling		<input type="checkbox"/> Other _____	
<input type="checkbox"/> Other _____			

Procedures:

This service is available to clients who require job supports to obtain, maintain, and retain employment and have an open CRP referral for Work Adjustment Services, Supported Employment, Individual Placement and Support Services or Brain Injury Support Services. The VR counselor should consider the rehabilitation needs of the client and the benefits of additional supports during hurricane recovery before discussing with the client and provider. The VR Counselor, client and CRP should agree upon the topics and a recommended number of hours. Once agreed upon, the VR counselor will add Community Inclusion to the IPE and issue an authorization for Community Inclusion for the agreed upon number of hours at \$44.20/hour. No more than 50 hours will be provided per client.

Community Inclusion services are individualized and may not be delivered to groups. Community Inclusion is fee for service and will not follow the general Encore CRP business flow. The provider will use the EIPD Standardized Community Inclusion Report to capture the required information. The service provision must result in a summary that includes the date(s) the service was delivered, the time spent to the quarter hour, the topic, an objective, and a summary of interventions provided, impact of interventions, and any documents produced during each individual training session all captured on the EIPD standardized Community Inclusion Report. Community Inclusion Reports can be submitted monthly or as completed. Reports can be submitted to VR via encrypted email, faxed, mailed, or hand delivered. Once submitted, the VR counselor will review and approve, VR support staff will upload the report into the document center and label it "Community Inclusion" and proceed with processing the payment.

This service is not subject to financial need or comparable benefits.



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MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: **December 13, 2024**
Re: **Interim Policy and Procedure Directive #05-2024: Guidance for Service Delivery – Impacts from Hurricane Helene – Expiration date extended**

Effective: October 23, 2024

The following guidance is issued to ensure there are no delays in service provision for those clients impacted by Hurricane Helene and to allow affected clients, and their families, to direct their financial resources toward storm-related needs.

This guidance pertains to clients impacted by Hurricane Helene.

This guidance will remain in effect until March 31, 2025. Any questions pertaining to the guidance noted below should be directed to the Policy Office.

Financial Needs Survey

The requirement to assess financial need as detailed in Volume I, Chapter 3, Section 10-1 and Volume VIII, Chapter 3, Section 8-1 is temporarily waived. The FNS should be completed in Encore in the following manner:

- Disability Income Verification screen – select N/A
- Family Income screen – Enter the client only using No Income as the verification type
- Allowed Deductions and Available Assets/Contribution screens can be skipped
- Excess Resource screen – Enter 3 into the Appropriate Time Period field
- Estimated Cost of Rehabilitation screen can be skipped
- Financial Need Category screen – Select Yes, needs test met. Add a case note to the case with the title “Hurricane Helene Relief Waiver” and include the following statement in the body of the note: “ *[Client name] has been significantly impacted by the devastation from Hurricane Helene. EIPD services are required to participate in the*

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rehab program. Assessing financial need and obtaining documentation would impact service delivery. EIPD leadership has approved waiving these requirements.”

If there are comparable benefits that must be applied to the cost of the rehab program (i.e. FAFSA, CAP funds) include details about applying these funds in the extenuating circumstances section.

Financial needs surveys completed as part of this directive should be completed for a period of no more than 3 months. Additional financials can be completed as individual client circumstances dictate.

Any emergency funds received from the impact of Hurricane Helene will be waived and not applied to the cost of the VR or IL rehabilitation program. However, if funds received are directly earmarked for services sponsored by the Division (i.e. home modifications) they should be considered a comparable benefit.

Verbal/Email Agreement for Client Signatures

The ability to obtain verbal or email agreement in lieu of a client’s physical signature is effective immediately. The agreement should be specific to a casework document, and not a general agreement from a client for all VR or IL documents.

Staff must document in a casenote when verbal or email agreement for a signature has been received by a client. If verbal (i.e. by phone) document the conversation with the client. If the agreement was obtained via email a copy of the email exchange should be uploaded to the case note. Upon completion of the documentation in a casenote the client’s signature on the casework document may be electronically signed and dated for the client in the case management system.

A hard copy or DocuSign signature is preferable whenever possible. Please make every effort to secure a signature via in person meeting, mail, fax or DocuSign before utilizing a verbal or email signature agreement.

60 day Eligibility Extensions

Federal Regulations require that the timeframe for determining eligibility may be extended when there are exceptional and uncontrollable circumstances beyond the control of the Division and the client agrees to the specific extension of time. Damage from Hurricane Helene meets the standard of uncontrollable circumstances. However, if a client cannot be contacted an extension is not permissible and the case must be closed status 08.

Staff are encouraged to track cases which must be closed to comply with these federal mandates. Outreach efforts, when conditions improve, should occur to encourage clients to reapply. All efforts should be made to use existing information to process quickly.

Transferring cases

Staff should consider transferring cases from affected counties to non-impacted counties to avoid disruption in service delivery or processing of authorizations. Prior to a transfer there must be agreement between the client, receiving counselor and transferring staff to avoid disruptions in service delivery. All transfers related to Hurricane recovery efforts should be routed through the help desk for assistance.

[Guidance Case Transfers.pdf](#)

The transfer of physical case files may not be possible during recovery efforts and is not required at this time. Collaboration between staff will be necessary to ensure that services are not delayed.



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**
Employment and Independence
for People with Disabilities

ROY COOPER • Governor
KODY H. KINSLEY • Secretary
CHRIS EGAN, MSW, LCSW • Assistant Secretary
KATHIE B. SMITH, MS, CRC, LCMHC, CPM • Director

MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: December 13, 2024
Re: **Interim Policy and Procedure Directive #01-2025: Voter Registration**

Effective: January 1, 2025

Voter Registration Policy

Background:

The National Voter Registration Act (NVRA) of 1993 was enacted to enhance voting opportunities for citizens, including individuals with disabilities who have historically low voter registration rates. NVRA requires that voter registration and the opportunity to update voter registration is made available to applicants and clients receiving services from designated State Agencies.

EIPD staff are required to provide the same level of assistance in completing the Voter Registration Form as would be offered in the completion of other agency forms. It should be explained to the client that registering or declining to register to vote will not affect services provided by EIPD. Agency staff must not seek to influence a client's political preference or party affiliation and must refrain from displaying campaign bumper stickers, wearing campaign or party buttons, pins etc. while conducting voter registration business.

All forms associated with the Voter Registration requirement are housed in the National Voter Registration Act (NVRS) section of the casework forms tab on SharePoint. These include:

- Voter Registration Form – official form used to register to vote or update registration
- Agency Transmittal Form – used when submitting voter registration forms to the Board Of Elections
- NVRA Remote Transaction Sheet – used to document voter registration or updated registration when handed via mail with a client
- NVRA Voter Application Handling Log – running log used to track all actions related to voter registration

Each unit office and satellite office shall have a designated NVRA site coordinator who is responsible for the following key actions. A backup staff member shall be identified for leave coverage of the primary designee.

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES
DIVISION OF EMPLOYMENT AND INDEPENDENCE FOR PEOPLE WITH DISABILITIES
LOCATION: 805 Ruggles Drive, Haywood Building, Raleigh, NC 27603
MAILING ADDRESS: 2801 Mail Service Center, Raleigh, NC 27699-2801
www.ncdhhs.gov/eipd • TEL: 919-855-3500 • FAX: 919-733-7968

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- Maintain an adequate supply of Voter Registration Forms. These forms can be requested through the NC State Board of Elections website. It is imperative that all forms used by the Division are coded with the agency code “02W” at the top so that it can be tracked appropriately by the NC State Board of Elections.
- Completed, updated Voter Registration forms must be sent to the appropriate county Board of Elections **within five (5) workdays of completion**. The NC NVRA Agency Transmittal Form is to be used and source type 02W is to be designated.
- Maintain copies of the Transmittal Forms and Voter Registration Application Handling Log for audit purposes for 4 years.

Procedures:

VR/IL Program staff must make voter registration available to individuals age 18 or older, and preregistration for individuals who are age 16 or 17 when the following occur:

- Application for VR/IL services
- Client change of address
- Client change of name
- Implementation of Post-Closure services (IL only)
- When assisting a client, the official question to ask is **“If you are not registered to vote where you live now, would you like to apply to register to vote here today?”**

All individuals applying for VR or IL services must be given the North Carolina Voter Registration Application Form regardless of their decision to receive assistance with completing and transmitting their application to register to vote. They may complete the form with VR/IL assistance, or may choose to take the form to complete at a later time.

The Voter Registration Preference form is incorporated within the Application /Agreement of Understanding in the electronic case management system. . The appropriate option should be selected on the Voter Registration Preference Form based on the client’s decision:

- YES, I would like to apply to register/preregister to vote here today
- YES, I would like to apply to register/preregister to vote, but I will take a voter registration application home to complete at a later time
- NO, I am declining the opportunity to register/preregister to vote today
- I am ALREADY REGISTERED to vote at my current address
- I am ALREADY REGISTERED but I would like to update my voter registration information. I will complete a voter registration Application/Update form for this purpose

If the Spanish version of the Voter Registration Preference form is required, it is available on the NC State Board of Election website and is to be presented to the applicant and attached to the Application for services / Agreement of Understanding.

Remote Transactions:

Whenever a client indicates they have an address or name change and are interested in registering to vote or updating their address/name, or it is permitted to mail or securely e-mail a Voter Registration Form to vote to the individual. If the individual indicates interest and has

accepted to receive an application to vote remotely, the NVRA REMOTE TRANSACTION SHEET is completed to demonstrate compliance with this requirement.

Retention of records:

Copies of all mailed or faxed transmittals submitted to the county Boards of Elections shall be retained in the respective unit/satellite offices for a period of 4 years for auditing purposes. Additionally, each office is to maintain a Voter Registration Application Handling Log that records the client ID, dates application to vote are completed and transmitted to the appropriate county Board of Elections office. This document will be subject to audit.

Any completed NVRA Remote Transaction Sheets shall be retained in the case record. No copies of completed Voter Registration Application forms shall be retained.

Training Requirements:

Staff are to review this policy annually and be apprised of any procedural or policy changes as directed by statute or State Board of Elections.

Posters:

Posters as provided by the NC Board of Elections indicating that applicants may apply to register to vote at the office are to be displayed in the office lobby of all offices where individuals apply for services.

Resources:

NC State Board of Elections:

Website: <http://www.ncsbe.gov/Voter-Registration/NVRA>

Phone: 1-866-522-4723

[52 U.S.C. § 20501 - 52 U.S.C. § 20511; NCGS §163-82.20]



MEMORANDUM

To: All Staff Assigned Volume I
From: Vicky Miller – Chief of Policy *Vicky Miller*
Date: March 21, 2025
Re: Interim Policy and Procedure Directive #02-2025: FNS Allowable Net Monthly Income Table

Effective: March 14, 2025

Increase in Allowed Net Monthly Income Amounts on Financial Needs Survey

Due to changes in federal poverty guidelines the following increases to Allowed Net Monthly Income will go into effect on March 14, 2025

Family Size	Poverty Guideline (125% annual income)
1	\$1,630.21
2	\$2,203.13
3	\$2,776.04
4	\$3,348.96
5	\$3,921.88
6	\$4,494.79
7	\$5,067.71
8	\$5,640.63
each additional	\$572.91

The paper-based form, available on the EIPD SharePoint Intranet site, and the electronic form, in ENCORE, have been updated accordingly. Those using the paper-based form in the field should verify that they have the latest version of the form. The following will appear at the top of the current paper-based form:

Financial Needs Survey Worksheet (effective 03/14/2025)

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES
 DIVISION OF EMPLOYMENT AND INDEPENDENCE FOR PEOPLE WITH DISABILITIES

LOCATION: 805 Ruggles Drive, Haywood Building, Raleigh, NC 27603
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