



GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT ON DISABILITY SERVICES

POLICY	
Department on Disability Services	Subject: Services and Authorizations
Responsible Program or Office: Rehabilitation Services Administration	Policy Number: 2019-RSA-POL006
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Supersedes Policy Dated: Section VI-4 DCRSA Policy Manual (2010) – Provision and Authorization of Services.	
Cross References, Related Policies and Procedures, and Related Documents: 34 C.F.R. Part 361, Informed Choice Policy, Rates of Payment for Purchased Vocational Rehabilitation Services (2015), Case Closure, Post-Secondary Education Policy and Post-Secondary Procedure, Supported Employment Policy, Maintenance Policy, Transportation Policy, Self Employment Policy.	

1. PURPOSE

The purpose of this policy is to clarify the nature and scope of each of the vocational rehabilitation (VR) services provided by the Department on Disability Services (DDS), Rehabilitation Services Administration (DCRSA or Agency) as well as the criteria under which each service is provided.

2. APPLICABILITY

This policy applies to all VR Specialists, supervisors, people served by DCRSA, providers, and stakeholders.

3. AUTHORITY

The authority for this policy is established in DDS as set forth in D.C. Law 16-264, the “Department on Disability Services Establishment Act of 2006.” Effective March 14, 2007 (D.C. Code 7-761.01 *et seq.*), and Establishment of the Rehabilitation Services Program (D.C. Code §32-331 *et seq.*), 29 DCMR 100 *et seq.*, and 34 C.F.R. Part 361.

4. POLICY

It is the policy of DCRSA to provide VR services that are necessary to assist persons to prepare for, secure, retain, regain, or advance in employment. The employment outcome shall be consistent with the person’s strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice. In order for services to be authorized by DCRSA, such services shall be determined necessary and appropriate to achieve the planned employment outcome.



A. Authorization

1. All vocational services shall be identified in the Individualized Plan for Employment (IPE) with the exception of assessment services necessary to determine eligibility, severity of disability, and VR needs, or services necessary for the person to participate in such assessments.
2. All services and goods that have been determined to be necessary and appropriate shall be procured at the least possible cost to DCRSA insofar as they are adequate to meet the needs of the person. Services and goods shall be planned and authorized with full consideration to comparable services and benefits and cost participation; and shall be consistent with DCRSA contracts, provider standards and agreements, and compliant with the fee schedule and purchasing rules and regulations of the District of Columbia.
3. Supervisory approval is required for individual purchases or plans totaling over \$10,000.
4. For VR Specialists who are newly hired or on monitoring, all IPEs and authorizations shall be co-signed by the supervisor. The co-signature of the Supervisor indicates that the authorization was checked for accuracy and authenticity in accordance with established DCRSA policy and procedures.
5. Written authorization must be made, simultaneously with, or prior to, the provision of the service or goods. Services cannot be provided prior to the issuance of a written authorization. Additionally, verbal authorizations are prohibited. If services are provided without or prior to a written authorization, the agency may not pay the provider for this service.

B. Comparable Services and Benefits

1. Comparable services and benefits are defined by 34 C.F.R. § 361.5(c)(8) as services and benefits provided or paid for, in whole or in part, by other Federal, State, or local public agencies, by health insurance, or by employee benefits; which are available to the person at the time needed to ensure the progress of the person toward achieving the employment outcome in the person's IPE in accordance with 34 C.F.R. § 361.53; and, are commensurate to the services that the person would otherwise receive from the designated State vocational rehabilitation agency. For the purposes of this definition, comparable services and benefits do not include awards and scholarships based on merit, however, to the extent they reduce the amount of tuition due, they may reduce the support



provided by DCRSA.

2. The following vocational rehabilitation services described in 34 C.F.R. § 361.53(b) are exempt from a determination of the availability of comparable services and benefits:
 - a. Assessment for determining eligibility and vocational rehabilitation needs.
 - b. Counseling and guidance, including information and support services to assist a person in exercising informed choice.
 - c. Referral and other services to secure needed services from other agencies, including other components of the statewide workforce investment system, if those services are not available under this part.
 - d. Job-related services, including job search and placement assistance, job retention services, follow-up services, and follow-along services.
 - e. Rehabilitation technology, including telecommunications, sensory, and other technological aids and devices.
 - f. Post-employment services consisting of the services listed above.
3. If a person assigned to a VR specialist does not have health insurance, the VR specialist shall assist the person in obtaining health care coverage in order to access comparable services and benefits.
4. VR Specialists shall advise the person and health care providers to submit a claim for eligible expenses to the person's health insurance prior to invoicing DCRSA; however, lack of health care coverage and/or issues around insurance claims shall not impede the progress of the person toward achieving an employment outcome.
5. The VR specialist shall complete a determination of the availability of comparable services and benefits for eligible persons prior to authorizing any non-exempt services unless such a determination would:
 - a. Interrupt or delay the progress of the person toward achieving the employment outcome identified in the IPE;
 - b. Interrupt or delay an immediate placement; or
 - c. Interrupt or delay the provision of VR services to any person who is determined to be at extreme medical risk, based on evidence of a medical professional.
6. If comparable services or benefits exist under any other program and are available to the person at the time needed to ensure the progress of the person toward achieving the employment outcome in the person's IPE, DCRSA shall use those comparable services or benefits to meet, in whole or part, the costs of the vocational rehabilitation services.
7. If comparable services or benefits exist under any other program, but are not



available to the person at the time needed to ensure the progress of the person toward achieving the employment outcome in the person's IPE, DCRSA shall provide vocational rehabilitation services until those comparable services and benefits become available.

8. The applicant or eligible person shall be responsible for cooperating with DCRSA in seeking and promptly applying for comparable services and benefits.
9. The VR specialist shall be responsible for documenting the comparable services and benefits determination, or providing justification for not completing the determination, prior to authorizing non-exempt services.

C. Cost Participation

Eligible persons shall contribute financially to the cost of VR services that they receive, pursuant to the standards set forth in 29 DCMR § 124. A person who receives Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) is exempt from the financial need test and is not required to contribute to the cost of VR unless the person chooses a more expensive good or service when a less expensive good or service would meet their rehabilitation needs.

Financial needs testing and cost participation shall not apply to the following VR services:

1. Assessment and related services to determine eligibility, priority for services, and vocational rehabilitation needs;
2. VR counseling and guidance and referral services that DCRSA provides;
3. Maintenance when additional costs are incurred as a result of undertaking or participating in assessment services;
4. Transportation when required to enable an eligible person to participate in assessment services (i.e., diagnostic services);
5. Job-related services, including job search and placement assistance, job retention services, follow-up services, and follow-along services;
6. Personal assistance services during the assessment process;
7. Auxiliary aids or services, such as interpreter services or reader services that an eligible person requires in order to participate in the assessment process



vocational rehabilitation program; and

8. Non-assessment services that are provided to an eligible person with a significant disability during either an exploration of the abilities, capabilities, and capacity to perform in work situations through the use of trial work experiences or an extended evaluation.

5. RESPONSIBILITY

The responsibility for this policy is vested in the Director of DDS. Implementation of this policy is the responsibility of the Deputy Director of DCRSA.

6. STANDARDS

It is the VR specialist's responsibility to document eligibility, necessity, informed choice, and case progress throughout the provision of VR services which may include the following services:

A. Pre-Eligibility Services

1. Assessment services are the primary services provided to persons prior to an eligibility determination. Other services may include transportation, maintenance, or other services associated with assessment services.
2. Assessment refers to services provided and activities performed to determine a person's eligibility for VR services, to assign a person to a priority category under order of selection, and/or to determine the nature and scope of VR services to be included in the IPE. These assessments may include, to the degree necessary to determine a person's eligibility for VR services, trial work experiences (refer to Trial Work Protocol), psychological assessments, audiological evaluations, dental and medical exams and other assessments of personality, interests, interpersonal skills, intelligence and related functional capacities, educational achievements, work experience, vocational aptitudes, personal and social adjustments, and employment opportunities of the person and the medical, psychiatric, psychological, and other pertinent vocational, educational, cultural, social, recreational, and environmental factors that affect the employment and rehabilitation needs of the person.
3. Prior to authorizing assessment services, the VR specialist shall collect and review existing documentation when available in order to make the eligibility determination. Assessment services are typically provided to persons in intake or eligibility status (Status 02, 06, or 10), but can be provided to persons in other statuses if it is deemed necessary to secure, retain, or advance in employment.



B. Scope of Vocational Rehabilitation Services

1. Vocational Rehabilitation Counseling and Guidance

VR counseling and guidance includes information and support services to assist a person in exercising informed choice. This service is provided throughout the VR process, but only requires written authorization to the extent that it is included on the IPE.

2. Diagnosis and Treatment of Impairments

Diagnosis and treatment of impairments are those services beyond assessment, which refer to the diagnosed disability, and are necessary for the achievement of the person's employment goal (34 CFR § 361.48).

Diagnosis and treatment of impairments includes, but may not be limited to, the following services:

- a. Corrective surgery or therapeutic treatment that is likely, within a reasonable period of time, to correct or modify substantially a physical or mental impairment that constitutes a substantial impediment to employment;
- b. Diagnosis and treatment for mental and emotional disorders by qualified personnel who meet State licensure laws;
- c. Dentistry;
- d. Nursing services;
- e. Necessary hospitalization (either inpatient or outpatient care) in connection with surgery or treatment;
- f. Drugs and supplies;
- g. Prescription of prosthetics and/or orthotics related to the person's diagnosed disability and is necessary for the achievement of the employment outcome;
- h. Prescription of eyeglasses and visual services, including visual training, related to the person's diagnosed disability and necessary for the achievement of the employment outcome;
- i. Podiatry;
- j. Physical therapy;
- k. Occupational therapy;
- l. Speech or hearing therapy;
- m. Mental health services;
- n. Treatment of either acute or chronic medical complications and emergencies that are associated with or arise out of the provision of physical and mental restoration services or that are inherent in the condition under treatment;



- o. Special services for the treatment of persons with end-stage renal disease, including transplantation, dialysis, artificial kidneys, and supplies;
- p. Other medical or medically related rehabilitation services; and
- q. Medical care for acute conditions arising during rehabilitation and constituting a barrier to the achievement of an employment outcome is also included in this category.

3. Training Services – Training services are designed to help the person improve educationally or vocationally or to adjust to the functional limitations of his or her impairment. As appropriate, the VR specialist shall also complete the Post-Secondary Consultation Worksheet.

4. Junior or Community College Training

Full-time or part-time academic training above the high school level leading to an associate degree, a certificate or other recognized educational credential. Such training may be provided by a community college, junior college, or technical college. Refer to Post-Secondary Education Policy and Post Secondary Procedure.

5. Four-Year College or University Training

Full-time or part-time academic training leading to a baccalaureate degree, a certificate or other recognized educational credential. Such training may be provided by a four-year college or university or technical college. Refer to Post-Secondary Education Policy and Post Secondary Procedure.

6. Graduate College or University Training

Full-time or part-time academic training leading to a degree recognized as being beyond a baccalaureate degree, such as a Master of Science, Arts (M.S. or M.A.) or Doctor of Philosophy (Ph.D.) or Doctor of Jurisprudence (J.D.). Such training may be provided by a college or university. Refer to Post-Secondary Education Policy and Post Secondary Procedure.

7. Occupational or Vocational Training

Occupational, vocational, or job skill training provided by a community college and/or business, vocational/trade or technical school to prepare students for gainful employment in a recognized occupation, not leading to an academic degree or certification. This would include selected courses or programs of study at a community college, technical college, or proprietary schools or programs.



8. On-the-Job Training

Training in specific job skills by a prospective employer. Generally the trainee is paid during this training and will remain in the same or a similar job upon successful completion.

9. Apprenticeship Training

An apprenticeship program is a work-based employment and training program that combines hands-on, on-the-job work experience in a skilled occupation with related classroom instruction. Structured apprenticeship programs generally have minimum requirements for the duration of on-the job work experience and classroom instruction, and/or could utilize competency-based elements but should have mechanisms in place to ensure quality and consistency of skills acquisition. Other elements that distinguish apprenticeship programs from other work-based efforts including co-op education, on-the-job training, and internships are the following: includes supervision and structured mentoring; provides for wage increases as an apprentice's skills increase; is based on an employer-employee relationship; and provides an Industry recognized certificate of completion of the program.

10. Basic Academic Remedial or Literacy Training

Literacy training or training provided to remediate basic academic skills that are needed to function on the job in the competitive labor market or to prepare for post-secondary education or vocational training

11. Job Readiness Training

Training to prepare a person for the world of work (e.g., appropriate work behaviors, getting to work on time, appropriate dress and grooming, and increasing productivity).

12. Disability-Related Skills Training

Disability-related skills training includes but is not limited to: orientation and mobility; rehabilitation teaching; training in the use of low vision aids; Braille; speech reading; sign language; and cognitive training/retraining.

13. Miscellaneous Training

Any training not recorded in one of the other categories listed, including GED or



high school training leading to a diploma, or courses taken at four-year, junior, or community colleges.

14. Job-Related Services - Job-related services include job search assistance, job placement assistance, and on-the-job support services.

15. Job Search Assistance

Job search activities support and assist a person in searching for an appropriate job. Job search assistance may include help in resume preparation, identifying appropriate job opportunities, developing interview skills, and making contacts with companies on behalf of the person.

16. Job Placement Assistance

Job placement assistance is a referral to a specific job resulting in an interview, whether or not the person obtained the job. This is not a discrete service used by DCRSA.

17. On-the-Job Supports – Short Term

Support services provided to a person who has been placed in employment in order to stabilize the placement and enhance job retention. Such services include short-term job coaching for persons who do not have a supported employment goal consistent with the employment goal on their IPEs.

16. On-the-Job Supports – Supported Employment (SE)

On-going support services and other appropriate services needed to support and maintain a person with a most significant disability in supported employment for a period of time generally not to exceed 24 months, prior to the closure of the VR case and transition to long-term extended SE supports. On-the-job supports, such as job coaching, are for persons who have SE and long-term supports identified on their IPEs, and are funded using Title VI, Part B, and Title I funds; however, long-term extended SE services may not be funded with Title VI, Part B, or Title I funds except in the case of youth, under the age of 25, with a most significant disability. Refer to the Supported Employment Policy

17. Transportation

Transportation, including adequate training in the use of public transportation vehicles and systems, means travel and related expenses that are necessary to enable an applicant or eligible person to participate in a VR service. Refer to the Transportation Policy. Examples of transportation services/expenses include, but



are not limited to:

- a. Payment of funds through a Smart Trip card to enable a person to use public transportation to participate in a VR service;
- b. Transportation to and from work for the first 30 days of employment;
- c. Training in the use of public transportation vehicles and systems.

Transportation service is not a standalone service and shall be terminated when the primary service being accessed is completed or terminated. In accordance with a person's IPE, transportation may continue following job placement until the person receives a first paycheck.

18. Maintenance

Maintenance means monetary support provided for those expenses such as food, shelter and clothing that are in excess of the normal expenses of the person, and that are necessitated by the person's participation in an assessment for determining eligibility and VR needs or while receiving services under an IPE. Refer to the Maintenance Policy. Examples of maintenance expenses include, but are not limited to:

- a. cost of uniforms or other suitable clothing required for a person's job placement or job seeking activities when a check is issued;
- b. cost of short-term expenses, such as food and shelter, that is required in order for a person to participate in assessment or vocational training at a site that is not within commuting distance of a person's home;
- c. initial one-time costs, such as security deposits or charges for the initiation of utilities, that are required in order for a person to relocate for a job placement; and
- d. cost of a person's participation in enrichment activities related to that person's training program.

19. Rehabilitation Technology

Rehabilitation technology means the systematic application of technologies, engineering methodologies, or scientific principles to meet the needs of, and address the barriers confronted by, persons with disabilities in areas that include education, rehabilitation, employment, transportation, independent living, recreation, home and vehicular modification, other assistive devices including, but not limited to hearing aids, low vision aids and wheelchairs. Rehabilitation technology includes rehabilitation engineering, assistive technology devices, and assistive technology services. See also 34 CFR § 361.5(b)(45). The term includes the following:



- a. **Rehabilitation Engineering Services**, which are the systematic application of engineering sciences to design, develop, test, evaluate, apply, and distribute technological solutions to problems confronted by persons served by DCRSA in functional areas such as mobility, communications, hearing, vision, and cognition, and
- b. **Assistive Technology Devices**, which are any item, piece of equipment, or product system, whether acquired commercially off the shelf, modified or customized, that is used to increase, maintain, or improve the functional capabilities of a person served by DCRSA.
- c. **Assistive Technology Services**, which are any services that directly assist a person with a disability in the selection, acquisition, or use of an assistive technology device. Services may include:
 1. evaluating the needs of a person, including a functional evaluation of the person in his/her customary environment;
 2. purchasing, leasing, or otherwise providing for the acquisition of an assistive technology device;
 3. selecting, designing, fitting, customizing, adapting, applying, maintaining, repairing, or replacing assistive technology devices;
 4. coordinating and using other therapies, interventions, or services with assistive technology devices, such as those associated with existing education and rehabilitation plans and programs;
 5. training or providing technical assistance for a person or, if appropriate, the family members, guardians, advocates, or authorized representatives of the person; and
 6. training or providing technical assistance for professionals (including persons providing education and rehabilitation services), employers, or others who provide services to, employ, or are otherwise substantially involved in the major life functions of persons served by DCRSA to the extent that training or technical assistance is necessary for persons to achieve an employment outcome.

20. Personal Assistance Services - Personal Assistance Services are a range of services designed to assist a person to perform daily living activities on or off the job that the person would typically perform without assistance if he or she did not have a disability. The services must be designed to increase the person's control in life and ability to perform everyday activities on or off the job. The services must be necessary to the achievement of an employment outcome and may be provided only while the person is receiving other VR services. The services may include training in managing, supervising, and directing personal assistance services.



21. Reader Services

Reader services are for persons who cannot read print because of blindness or other disability. Reader services include, in addition to reading aloud, transcription of printed information into Braille or sound recordings if the person requests such transcription. Reader services are generally for persons who are blind or deaf-blind, but may also include persons unable to read because of serious neurological disorders, specific learning disabilities, or other physical or mental impairments.

22. Interpreter Services

Interpreter services are sign language or oral interpretation services for persons who are deaf or hard of hearing and tactile interpretation services for persons who are deaf-blind. Specially trained persons perform sign language or oral interpretation. Interpreter services also include real-time captioning services for persons who are deaf or hard of hearing.

23. Personal Attendant Services

Personal attendant services are those personal services that an attendant performs for a person with a disability including, but not limited to bathing, feeding, dressing, providing mobility and transportation, etc., in multiple settings to include home, work and training facilities/school.

24. Technical Assistance Services

Technical assistance and other consultation services provided to conduct market analyses, to develop business plans, and to provide resources to persons in the pursuit of self-employment, telecommuting and small business operation outcomes. Refer also to the [Self Employment Policy](#).

25. Information and Referral Services

Information and referral services are provided to persons who need services from other agencies (e.g., through cooperative agreements) not available through the VR program.

26. Benefits Counseling

Assistance provided to a person who is interested in becoming employed but is uncertain about the impact of work income on any disability benefits and



entitlements being received and/or may not be aware of benefits, such as access to healthcare, that might be available to support any work attempt. This typically involves an analysis of a person's current benefits, such as social security disability insurance (SSDI) and supplemental security income (SSI), the person's financial situation, and what effect different income levels from work will have on the person's future financial situation. This assistance is intended to give the person an opportunity to make an informed choice regarding the pursuit of employment. Ongoing assistance may also be provided as the person decides upon employment goals, searches for jobs, and obtains employment.

27. Customized Employment Services

Services that involve a blend of flexible strategies that result in the provision of individually negotiated and designed services, supports, and job opportunities for a person with a disability and that lead to an employment outcome of customized employment, including self-employment. A key factor in deciding if a service is a customized employment service is the presence of employer negotiation, including customizing a job description based on current unidentified and unmet needs of the employer and the needs of the employee; developing a set of job duties or tasks; developing a work schedule (including determining hours worked); determining a job location; developing a job arrangement (such as job carving, job sharing, or a split schedule); or determining specifics of supervision.

28. Other Services

Other services may include but are not limited to the following:

- a. Occupational licenses, tools and equipment, initial stocks and supplies (refer to Self Employment Policy);
- b. Language interpretation;
- c. Interview clothing and/or work uniforms purchased using a DCRSA credit card; and
- d. Services to family members if necessary to enable the applicant or eligible person to achieve an employment outcome.


29. Extended Services for Youth

Extended services may be provided to youth with a most significant disability (under the age of 25) who have achieved a supported employment outcome in competitive, integrated employment, and for whom no other source of extended services is available (see Supported Employment Policy). These services may be provided for a maximum of 48 months or until the person reaches the age of 25. The person must be in Status 31 to receive these services.



30. Post-Employment Services

Post-employment services are provided to persons whose cases have been closed after achieving successful, competitive, integrated employment for the purpose of maintaining or advancing in employment. The person must be in post-employment status (Status 32) to receive these services. Post-employment services are expected to be of a one-time nature and not provided in excess of 18 months.



Darryl Evans,
Deputy Director, DCRSA

2/12/19
Approval Date



Andrew P. Reese, Director

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Approval Date