

CHAPTER X

VOCATIONAL REHABILITATION CASEWORK PRACTICES UNDER THE WIOA COMMON PERFORMANCE MEASURES

SECTION I: DEFINITIONS

- A. WIOA Common Performance Measures: These are the federal measures for the DVR program and are as follows:
1. Employment rate at six months post program exit
 2. Employment rate at twelve months post program exit
 3. Median Earning at six months post program exit
 4. Measurable skills gains
 5. Credential attainment
 6. Employer satisfaction

SECTION II: GENERAL POLICY GUIDANCE

The WIOA Common Performance Measures encourage DVR to support consumers achieve longer term aspirational career goals. DVR has launched the Careers Initiative to promote practice that will support consumers achieve higher level employment. The purpose of this chapter is to provide counselors with policy guidance to counselors around:

- The development of IPEs and managing cases within the new career focused paradigm
- Case expenditures within the new career focused paradigm

Nothing in this guidance is intended to override or replace DVR policy and guidance in other chapters in the DVR Policy Manual. This guidance is a supplement to those chapters intended to support counselors manage casework and case services within the new career focused paradigm.

SECTION III. DEVELOPMENT OF IPEs AND MANAGING CASES UNDER THE WIOA COMMON PERFORMANCE MEASURES

A. Development of IPEs and amendment of IPEs to support careers

The Rehab Act does give the VR counselor lots of flexibility on how to support a VR consumer achieve a long-term career goal. The IPE amendment process also allows the counselor and consumer to explore career options and change direction during the rehabilitation process. The following case examples are intended to illustrate how you can use the IPE and IPE amendment process to support careers:

Case Example One: I have a consumer who has a long-term career goal, but also needs help getting a job right now to pay the bills. Can I help my consumer get the "right now" job as well as support them with a long-term career goal?

Yes, you can. In an IPE you must list the services needed to achieve the employment outcome. If a consumer needs income right now, to be able to pursue their longer-term career goal, it is

perfectly fine to support the consumer get that immediate job. The services necessary to get the immediate job should be listed on the IPE. For example, this might include:

- Referral to VABIR for job placement in the immediate job
- Work clothes or money for gas for the immediate job
- Car repairs to get to that immediate job

The VR counselor should document the purpose behind these expenditures in the IPE case note. For example: “Joe is starting his CDL program in July. However, he needs income to be able to participate in the program. Therefore, I have referred him to VABIR for job placement services for an interim job, while he completes his CDL”.

Case Example Two: My consumer has a long career goal of becoming a Registered Nurse. This is an aspirational goal that will take many steps and many years to achieve. Should the IPE employment goal be to achieve an RN position, or should the goal be an incremental step towards that eventual goal?

In most cases, it might be wise to work with the consumer on a sequence of successive plans designed to achieve interim steps towards this eventual goal. In this case, it might involve three separate plans over multiple years. For example:

Plan One Goal: Licensed Nursing Aide

Plan Two Goal: Licensed Practical Nurse

Plan Three Goal: Registered Nurse

Each IPE would only list the services to achieve each specific goal and credential. You would close the case when the goal was achieved. DVR would get the credit for both the employment outcome and credential attained with each case. In your case notes you can note the consumers long term career goal of becoming an RN

Case Example Three: My consumer came to VR just wanting a job right away. She is not able to think about long term career goals right now, even though I see great potential in her. Can I develop an IPE to meet her immediate need but work with her to see if I can help her see other opportunities?

You can only engage the consumer where they are at. So, if their goal is an entry level position that is okay. We can still get the employment outcome and close the case.

However, during the process we would encourage the VR counselor to explore higher level career options through the counseling process. If the consumer becomes open to considering a more aspirational employment goal, the counselor has two options.

- a) If the consumer is in stable employment, the counselor could close the case as a successful employment based on the original employment goal, and open a new case with the individual to develop a new IPE or;
- b) If the consumer is not currently working, complete a full IPE amendment with the new aspirational career goal and required services to achieve the goal.

Case Example Four: My consumer has lots of ideas about potential career goals but is struggling to narrow down his focus. He is young and has limited work experience, so it is not surprising he does not know exactly what he wants to do. Can I develop an IPE for career exploration?

The IPE requires an employment goal. So, you cannot have an IPE simply for career exploration alone (School to Work cases for high school students are the exception to this rule and can write an IPE for a “projected post school outcome”). For adult cases, you can select an employment goal that is broad enough (such as “Sales and related workers, all others” in AWARE) to allow the consumer to explore a prospective career in a broad field. The services on the plan should:

- Be limited to exploratory type activities like progressive employment or trying out one community college class.
- An exploratory plan should not include substantial training and educational services
- Case expenditures should be limited to \$500 or less total. This is so significant funds are not spent on exploratory activities.

Once the consumer has completed the exploratory activities, the DVR counselor should develop a new IPE with the specific employment/career goal and services necessary to achieve that goal. At this point the IPE can include:

- Substantial training and educational services
- All the necessary case service expenditures to achieve the goal

The IPE and IPE amendment process in this case provides the counselor a framework to go from a vague general goal to something more specific and focused.

B. Case Service Expenditures to Support Careers

Determining when to assist DVR consumers with basic support needs

The DVR program is an employment and training program and case service expenditures must be directed towards assisting DVR consumers achieve their employment goals. However, many DVR applicants and DVR consumers have basic support needs for food, housing and other essential items. These needs are real, and it is important for DVR as an organization to be compassionate and help people access the appropriate non-DVR resources available. However, it is also important to recognize that it is not the purpose of the DVR program to provide financial assistance to meet basic needs.

When assessing DVR applicant and DVR consumer requests it is important for the counselor to consider the following:

- DVR is an employment and training program and not a basic support program.

- DVR case service expenditures must be directly related to the achievement of an employment outcome as described in the IPE. *It is not allowable under WIOA for DVR to expend funds simply to meet a basic need.*
- There is no entitlement to DVR services as there are with some basic support programs.
- Employment is the only reliable route out of poverty for most DVR applicants and consumers. DVR resources should be focused on helping people achieve long term sustainable employment, not to provide short term financial support.

DVR can assist a consumer with basic support needs *if it can be directly tied to the achievement of an employment outcome* as described on the IPE. In some situations, this might be the key service that helps the person achieve an employment goal. The DVR counselor should consider the following factors:

- Are there other potential sources of support available including comparable benefits?
- Does this expenditure help move the consumer to a sustainable situation? For example, can the consumer afford to maintain the car they are requesting support for a repair?
- Is the consumer engaged in the VR program and their plan for employment? Or are they simply looking for financial assistance?
- Are the basic support services I am providing necessary to the achievement of the employment goal?

The following case studies are suggested approaches to common situations:

Basic Support Case Studies

Joe applied for DVR services a year ago. He presented an immediate need for a car repair to help him get back to work. After finding Joe eligible and developing an IPE, I authorized a \$800 car repair. After, DVR paid for the car repair Joe stopped showing up for meetings and I eventually closed the case. Now he is back and presenting with a new car repair.

In this situation it is reasonable and appropriate to evaluate if Joe truly has an employment goal or is just seeking help with a car repair. The counselor should use the initial interview process and assessment process to determine if Joe has an employment goal and is engaged in the DVR process. If Joe is reluctant to engage in the VR process that would be evidence that he is not serious about pursuing an employment goal and the counselor should consider closing the case.

Mary is currently working 40 hours per week in retail making close to minimum wage. She has an opportunity to go into and LNA program through a VSAC non-degree grant but will have to reduce her hours. She estimates she would need \$2,500 over the next three months to pay her rent so she can complete the program.

In this situation, the basic support is clearly going to make it possible for Mary to complete the LNA program. It is therefore, clearly allowable as an IPE service. Even though this is a large case service expense, it would put Mary in a higher earnings category and give her a credential that has value over a lifetime. This is clearly a situation where assisting Mary with basic supports is related to a substantial career goal.

Using the DVR Spending Guidelines to Supporting Careers

DVR law and regulations provide the DVR counselor lots of scope for making judgements about what services and supports are necessary to assist the consumer achieve their employment goal. The WIOA Common Performance Measures encourage DVR counselors to focus services and spending on activities that will help DVR consumers achieve credentials and higher-level career goals.

- The spending guidelines are just that, guidelines. The DVR counselor is expected and encouraged to make judgements around what is necessary for the individual to achieve an employment outcome.
- It may be necessary to go beyond the spending guidelines when supporting a DVR consumer achieve a higher-level career goal
- It is appropriate to consider the level of the employment goal when determining how much to spend on a case. For example, it is reasonable to spend more funds on a plan that will help a consumer achieve a credential leading to higher wage employment.
- Conversely, it may be appropriate to spend less than the guidelines if the consumer employment goal is more limited. It is appropriate for a DVR counselor to consider the reasonableness of the expense as compared to the outcome. For example, it would not be reasonable for DVR to purchase and adapt a \$100,000 van for a consumer who was only going to work 10 hours per week.

The following case studies are suggested approaches to common situations:

Case Study using the DVR Spending Guidelines to Supporting Careers

Michael had almost no resources or income when he applied to the DVR program. After I found him eligible I referred him to an employment consultant to get an immediate job in retail to get some income coming in. However, he still has a very limited income. He has been accepted into an apprenticeship program that could be a real-life changing opportunity. However, he really needs hearing aids to participate. However, he can only contribute \$200 to the expenses and the spending guideline is not enough to cover the balance.

In this situation you can clearly justify exceeding the spending guideline to achieve the employment goal. If Michael is successful in the apprenticeship he will have a credential and be qualified for higher wage and more stable employment.