1. The 85% utilization is not consistent with the experience of the vendors and is unrealistic. Because of the OOD definitions for the services, utilization varies and should be based by service not as an overall average. For example for job developers, a 60% utilization rate is a reasonable target, for job coaching and community based assessment, 75% is a reasonable target. (PRIORITY ISSUE)
2. The 100% rehabilitation rate is not realistic for performance based fees. OOD has a current rehabilitation rate of 50%. As a result, performance based fees should reflect all services performed for the individual with the modifier of a 50% success rate. The proposed rate is a disincentive to serve the hardest to serve, which is a direct conflict with the state of Ohio’s current policy objectives.
3. Performance based Job Development rate will not cover the costs associated with the number of hours needed for these services. Using the decreased proposed rates, Tier 1 will cover only 17 hours of service before the entire risk is shifted to the provider. Including Tier 2 would allow for an additional 17 hours of service only if the individual obtains a job. This structure will result in vendors having to make a decision as to whether to accept a consumer into services an/ or continue services with no ability to recoup costs, resulting in consumer cases being closed for financial reasons. If we use the actual cost of providing services, the number of hours funded by Tier 1 is 15 and by Tier 2 is 14 which will further reduce vendors ability to provide on-going services. (PRIORITY ISSUE)
4. Mileage needs to be reimbursed. Many of the services that vendors perform for VR require travel. Due the disability issues as well as the lack of public transportation in many areas, vendors are required to travel to the consumer’s location in order to provide services.

By eliminating mileage reimbursement, there is a high probability that consumers in rural areas or those unable to access public transportation will not receive the level of service they require as vendors will not be able to financially support travel expenses in addition to the non-billable travel time reflected in the proposed fee schedule. (PRIORITY ISSUE)

1. Report writing should be broken out as a separate fee from the services that are being provided to the customer. Reports are very specific to the consumer and have very little generic or “off the shelf” information. For example, for job coaching, the initial report set up to include tasks, initial performance and employer standards on average takes one hour. In order to accurately and appropriately document progress within the existing report template, on average staff are spending 30 minutes per each shift worked with the consumer. If a consumer works four days a week, that is 8 hours for daily entries in addition to entries required to actually generate the invoice via various billing systems around the state. Of course, these estimates may vary depending on the day, the information and the writer. Thus, we believe that by separating out report writing from the service rate, OOD will get a more accurate invoice for the time spent on reporting activities.
2. We have serious concerns about the viability of vision services and assistive technology if the proposed rates are implemented. Currently, there are too few providers in Ohio to cover the need for these services. Rate cuts would not only drive those providers out of business but also prevent additional providers from entering this business and providing this service. How many data points were available within the state of Ohio to determine these costs? This is a very specialized field that requires extensive initial training and certification, but also ongoing training to maintain that certification. Were these training requirements factored into the cost?
3. This report proposes a static rate and does not make recommendations for inflation or other economic factors that would influence the cost of doing business such as an increase in minimum wage or additional credentialing or accreditation requirements.
4. The proposed rate for intake activities does not reflect current OOD policy or time intake requires. Current Ohio Administrative Code requires all vendors to be accredited (with the exception of Employment First Providers). If CARF requirements are considered as part of the intake process, intake will be longer than 2 hours. In addition, it us our understanding that there is an expectation that OOD counselors will use more than 2 hours of time for the intake process and entry into AWARE. Historically, during new counselor training, they are advised that for every hours spent with a consumer, a minimum of 3 hours of paperwork and data entry should be expected. Why would the assumption be that it would take vendors less time? The new intake template requires duplication of effort as it does not fully meeting accreditation requirements, but does contain some of the same components. The result of this duplication of documents in order to meet both OOD billing and CARF requirements is that the assumption of 2 hours for an intake is not accurate.