



February 22, 2019

Director Kevin Miller
Opportunities for Ohioans with Disabilities
150 East Campus View Boulevard
Columbus, Ohio 43235

Dear Director Miller,

OPRA members are sincerely thankful for the opportunity to give feedback on the proposed changes to the OOD Provider Manual. We appreciate the collaborative process that has been used to develop these changes and look forward to implementation in October, 2019. We have reviewed the proposed changes and have the suggestions below.

VR Reports & Invoices (pg. 8)

OPRA members ask that OOD set a time frame for OOD employees to notify providers when an invoice has errors. OPRA members also ask that when corrected invoices are submitted and other invoice errors are found that were not identified previously, that providers have an additional 21 days to correct and resubmit.

Site Coordination (pg. 11)

OPRA members are in support of the addition of Site Coordination. We request that OOD clarify the process of VR Counselor authorization for Site Coordination and Site Development.

CBA- Rapid Engagement Premium (pg. 19)

OPRA members suggest that OOD change the criteria for the Rapid Engagement Premium for Community Based Assessments from 30 days to 45 days to allow enough time for the development of person-centered assessment sites.

Career Exploration (pg.21)

OPRA members request that OOD clarify if work samples are to be paid or unpaid.

Job Readiness Training (pg. 28)

OPRA members request that OOD clarify if providers will be able to initiate Job Readiness sites, or if site development will only be initiated by OOD, as required in the current VR Provider Manual.

OPRA members suggest that OOD add placement premiums to this service.

Summer Youth Work Experience (pg. 32)

OPRA members request that OOD clarify if work samples are to be paid or unpaid

OPRA members suggest that OOD offer site development reimbursement for Summer Youth Work Experience.

OPRA members request that OOD clarify what the process will be for youth who may require the week of vocational education that is being removed from this service (or a period longer than the one day onboarding).

OPRA members suggest that OOD add placement premiums to this service.

Job Development (pg. 39)

OPRA members request that OOD give the option of a resume or mock applications for non-permanent placements and placements for transition youth.

Supported Employment – Job Development (pg. 41)

OPRA members strongly suggest that OOD develop rules that allow providers to bill for Supported Employment when direct support professionals who are non-CESPs, but who are working to complete the year of employment experience necessary to sit for the CESP examination, provide the Supported Employment services, as long as they are receiving structured mentorship and oversight from a CESP.

OPRA members also ask that OOD allow for non-CESP Certified Rehabilitation Counselors to provide Supported Employment services.

OPRA members suggest that the following language be added to Supported Employment; "Tier II may be authorized more than once, as needed, for subsequent placements in which the Participant loses the previous position that they were placed in but prior to the final monthly Tier III payment."

On-The-Job Supports Shift Differential (pg. 47)

OPRA members suggest that the shift differential be applied to OTJS that are scheduled to begin after 5 P.M. or before 5:30 A.M., and on weekends.

OPRA members also request that OOD clarify how the OTJS Shift differential will be authorized.

Sincerely,



Lisa Mathis on Behalf of OPRA Members
Director of Employment Services
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