## Vocational Rehabilitation Fee Schedule Summary of Stakeholder Recommendations & OOD Response May 2, 2019

Opportunities for Ohioans with Disabilities (OOD) shared a draft copy of the proposed VR Fee Schedule update on April 9th, with a comment review period open through April 23, 2019. The following summary includes feedback received during this comment window.

Recommendation	Provider Feedback	OOD Response
Authorization and Procedural Guidance	There was a request for authorization and procedural guidance in relation to some services, including Site Coordination, CBA Rapid Engagement, and the On-the-Job Supports Shift Differential.	The Administrative Rule making process for the VR Fee Schedule only includes the service definitions and rates. Technical guidance, including authorization guidance, is a part of the VR Provider Manual. OOD intends to make corresponding changes to the VR Provider Manual to align with the VR Fee Schedule and to provide additional clarification where needed. OOD has made a note of these requests and will be certain to clarify the VR Provider Manual and/or cover the topics in training as we approach implementation.
On-the-Job Supports Shift Differential	It was suggested that the window of time for the shift differential be expanded, and applied to weekends.	OOD has experienced difficulty identifying providers to cover third shift hours and the shift differential was designed to address these hours of service need. It should be noted that this service also is receiving the 6.5% across the board increase, which will further assist providers in addressing their personnel needs.
Supported Employment CESP Requirements	OOD received some feedback requesting that CESP requirements for Supported Employment be eased, allowing for supervisory staff to hold CESP, or for a CRC credential to waive the CESP requirement.	It should be noted that OOD has previously recommended removal of the CESP requirement for Tier III of Job Development (retention) to allow for job coaches to provide this service following On-the-Job Supports in response to provider feedback. OOD will also clarify that individuals with a CRC meet this credential requirement for Supported Employment Job Development.
JSST Element of Tier I Job Development	A provider requested that the JSST element of assisting a participant in obtaining work	OOD is considering new methods for purchasing interview clothing. In the meantime, when this part of JSST is required, it is currently covered in the Tier I rate.

	clothing be removed from Tier I and be authorized separately.	
Work Incentives Planning Rates	It was suggested that the rates for Work Incentive Planning services be increased beyond the 6.5% across-the-board rate.	OOD recognizes the value in this important service, and is planning on increasing the rate by 6.5%. OOD has not received any data to suggest this service should have a higher rate increase compared to other services.
Mileage	Some providers indicated a preference for reintroducing mileage reimbursement into the VR Fee Schedule as a method to increase compensation for services.	The VR Fee Schedule implemented on October 1, 2017 established cost informed rates that included the cost of staff travel time and mileage in the calculation of the rates. OOD has a strong desire to continue with this fee structure model which reduces the administrative burden on the part of both providers and OOD staff resulting from billing for mileage reimbursement.