

Summary of DVR Proposed Policy Changes – July 2018

CHAPTER	CHANGE	RATIONALE
Introduction	None.	
Chapter 1: Legal and Operational Basis	<ul style="list-style-type: none"> 1.2.3 (Safety) – Update to SPP references 	<ul style="list-style-type: none"> Technical clean-up
Chapter 2: Use and Release of Personal Information	None.	
Chapter 3: Informed Choice	None.	
Chapter 4: Reviews, Appeals, and Mediation	<ul style="list-style-type: none"> Renamed section titles in 4.9 to align with titles in Client Handbook 	<ul style="list-style-type: none"> Technical clean-up
Chapter 5: Applications	None.	
Chapter 6: Eligibility	None.	
Chapter 7: Order of Selection	None.	
Chapter 8: Severity of Disability	None.	
Chapter 9: IACA	None.	
Chapter 10: Expenditure of Funds	<ul style="list-style-type: none"> 10.5 – Remove requirement of Financial Need Analysis (FNA) for Trial Work Experiences; occupational goods & Services; self-employment goods & services; secondary education. 10.5 – Remove annual review of FNA; clarify that the FNA may be expired when no services are immediately needed. 10.5 – Clarifying guidance that SSI/SSDI exemption does not apply to self-employment start-up. 10.5.1(c) – Added clarification that expenditures to maintain health and vitality of guide dog or service animal can be deducted from FNA. FNA/Comp Benefit Guide – updated to reflect changes described above. 	<ul style="list-style-type: none"> Eliminating the requirement for FNA from these goods and services will simplify the process with minimal fiscal impact, while maintaining the requirement for goods and services with the highest impact fiscally. The annual review does not frequently identify significant changes; the review that occurs within 45 days of a change in financial status is more useful for this purpose. If no services are needed it is not relevant to update the FNA, even if there has been a change in financial status. Concern from self-employment counselors that clients sometimes do not understand they may need to contribute to start-up costs when eligible for SSI/SSDI. Inconsistency across counselors about how they have handled this; also concern about the increasing presence of other types of support animals, not recognized as service animals Same as above

	<ul style="list-style-type: none"> Financial Status Verification Guide – new, created to clarify acceptable types of documents to verify financial status 	<ul style="list-style-type: none"> Ongoing confusion among counselors and clients about the documentation required to verify financial status.
Chapter 11: IPE	<ul style="list-style-type: none"> 11.8 (Annual IPE Review) – revised language that required annual review of FNA for consistency with chapter 10. 	<ul style="list-style-type: none"> Ensure consistency with requirements in Chapter 10 related to FNA review.
Chapter 12: VR Services	<ul style="list-style-type: none"> 12.1.1(e) – Revised language to address \$5000 threshold for state ownership; removed procedural language; Clarifying language that when purchasing equipment that must be titled/registered State of Colorado holds title until successful closure/client responsible for insurance. 12.2.15 (Residential Mod) – Clarification to the types of modifications that will be considered; Added language that scope of modifications limited to essential for safe and independent function to participate in IPE; added language that expansion of scope of work is responsibility of client; added language client is responsible for upkeep, maintenance, and insurance; added language that modification is typically one time service; added language requiring permits 12.3.1 (Maintenance) – Clarification that payment does not exceed actual expenses incurred; Added language defining short-term vs. long-term maintenance and created policy related to short-term maintenance (modeled by CDLE travel policy for staff); Clarified that livingwage.mit.edu is used for determining additional living cost 	<ul style="list-style-type: none"> Clarification regarding requirements and streamline process for both clients and counselors; Clarification from accounting for equipment requiring title Address ongoing confusion among counselors and clients related to residential modifications; establish reasonable parameters to address areas of consistent application across the state. Address ongoing confusion and inconsistent application across the state; establish reasonable parameters to support intent of regulation/policy allowing for DVR to provide maintenance to support costs in excess of normal living expenses incurred to participate in VR.
Chapter 13: Services for Ind. Who are Blind and VI	None.	
Chapter 14: Supported Employment	None.	
Chapter 15: Transition	None.	
Chapter 16: Self-Employment	None.	
Chapter 17: Closure	<ul style="list-style-type: none"> 17.4.1 (Semi-annual and Annual Review) – Created new language addressing the regulatory requirement for DVR to complete semi-annual/annual review and re-evaluation of employment that is not CIE 	<ul style="list-style-type: none"> Regulatory requirement.

	<ul style="list-style-type: none"> • OOS section renumbered to 17.4.2 	<ul style="list-style-type: none"> • Technical clean-up.
Chapter 18: Limitations on Subminimum Wage	None.	
Appendix A: Definitions	<ul style="list-style-type: none"> • Definitions of strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice were clarified. All definitions were organized under Comprehensive Assessment. • Added definition of service animal (based on ADA definition). 	<ul style="list-style-type: none"> • Previously some of these terms were defined as one idea (e.g. Abilities and capabilities). This caused confusion for counselors when completing the IACA and addressing each separately. Each is identified separately in regulation. • Costs associated with service animals are considered during the FNA, but the term was not defined.
Appendix B: SSDI/SSI Guidance	None.	
Appendix C: Guidance for Marijuana through Service Provision	None.	
Appendix D: Client Fraud Procedures	<ul style="list-style-type: none"> • Quarterly file review for duration of case will now be completed by Regional Manager rather than District Supervisor; Authorizations will be issued by District Supervisor for 1 year, rather than Regional Manager. 	<ul style="list-style-type: none"> • District Supervisor more involved with the day to day workings of the case and better able to monitor appropriateness of authorizations; Regional Manager's quarterly review will be more comprehensive and provide reasonable controls/monitoring of fraud risk.
Appendix E: Maintenance Examples (NEW)	<ul style="list-style-type: none"> • Developed examples to guide counselors through consistent application of maintenance policy. The examples walk through common circumstances in which maintenance is considered, point to specific methods for calculating allowable payment, and support determination of least possible cost. These examples are consistent with current policy, but will likely feel like a significant change in practice in some areas. 	<ul style="list-style-type: none"> • Long history of inconsistent application of maintenance policies across counselors. Types of inconsistencies include: <ul style="list-style-type: none"> ○ Circumstances in which maintenance is allowable ○ Calculations of allowable DVR contribution when maintenance has been determined necessary ○ Determinations of least possible cost (e.g. mileage reimbursement vs. maintenance)